



EMBARQTM

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February 27, 2009

Ms. Ann Cole
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 000121B-TP

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. is Embarq's February 2009 Root Cause Analysis (RCA) report as required by Order Number PSC-03-0176-CO-TP in Docket 000121B-TP. This order required that any failure in three consecutive months to meet any performance for a given level of disaggregation shall require a RCA by Embarq, which shall then be published on a monthly basis. This report is for results for the period of October 2008 through December 2008 as published in the November, December and January reports.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

pub Susan S. Masterton

Enclosures

cc: David Rich
Jerry Hallenstein
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to all known parties of record this 27th day of February, 2009.

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Susan S. Masterton



February 2009 Root Cause Analysis Report (reflects December 2008 data, published January 2009)

Florida Public Service Commission

Background

If there is non-compliance at the aggregate level in three consecutive months for a given level of disaggregation, Embarq shall provide a report of root cause analysis on a monthly basis. Embarq's root cause analysis shall include a plan for corrective action with key activities and anticipated completion dates for implementation.

Measure 7: Average Completed Interval Submeasure 07.01.02 : Residential POTS - No Field Work					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
The increase in porting orders and the way in which they are closed out (CLEC has 10 days after DD) is causing non-compliance. The difference between the CLEC result and the Embarq result is .25	1Q2008			Ongoing	This issue is being investigated to see if it is a CLEC training issue or a system/analyst problem which can be corrected with training. Once this is determined proper course of action will be taken. Embarq will continue to monitor this measure to ensure parity is maintained.

Measure 7: Average Completed Interval Submeasure 07.02.02 : Business POTS - No Field Work					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
The increase in porting orders and the way in which they are closed out (CLEC has 10 days after DD) is causing non-compliance.	2Q2008			Ongoing	This issue is being investigated to see if it is a CLEC training issue or a system/analyst problem which can be corrected with training. Once this is determined proper course of action will be taken. Embarq will continue to monitor this measure to ensure parity is maintained.

Measure 7: Average Completed Interval Submeasure 07.101.01 : Residential POTS - UNE Loops xDSL Provisioned - Field Work					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Of the eight non-compliant orders, three were missed due to service provisioning, two had errors and two were dispatched twice.	3Q2008	NA	NA	ongoing	Embarq is conducting continuing education to technicians on UNE's behind remote's techniques. Embarq will continue to monitor this measure to ensure parity is maintained.



**Measure 7: Average Completed Interval
Submeasure 07.11.01 : Residential POTS - UNE Loops Non-Designed - Field Work**

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Of the six non-compliant orders, four or 67% were delayed due to service provisioning and two or 33% were missing the \CIRAS COMP fld.	3Q2008	NA	4%	ongoing	Management is working to address provisioning and exhaustion issues to allow for timelier processing of orders, also they have been advised of the importance of adding the \CIRAS COMP fld when the CIRAS order closes and correcting errors in a timely manner.

**Measure 11: Percent of Due Dates Missed
Submeasure 11.11.01: UNE Loops Non-Designed Field Work**

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Of the ten non-compliant orders, four or 40% were due to technician workload and two or 20% were due to errors.	7/08	NA	18%	ongoing	The dispatch management has been informed of the importance of dispatching to businesses during the customer's working hours. Additionally, business office management has been notified of the importance of providing correct information on orders and taking action to prevent order errors. The appropriate management has been notified of the importance of providing training and processes which minimize errors.

Measure 17A: Percentage of Troubles within 5 days for New Orders

Submeasure 17A.01: Residential POTS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Of the 21 orders with tickets within 5 days, eight or 38% were due to deteriorated buried and aerial cable and buried drop. Six or 29% were due to missing or incorrectly wired jumpers on the frame.	2Q05	NA	7%	ongoing	Embarq is meeting with contractors on a weekly basis to ensure proper procedures are followed. We continue to emphasize completion testing on service orders and are replacing outside plant cables that contribute to trouble tickets. Embarq is also reaching out to CLEC's with high levels of troubles to further investigate the issue. Embarq's account management and analysis team are working with affected CLEC's to improve understanding and communication of repair issues.

**Measure 18: Average Completion Notification Interval
Submeasure 18.03: Electronic/Manual Mix**



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Of the 58 non-compliant orders, 31 or 53% were due to failure of the closing dates to populate in IRES. Seventeen or 29% were due to an R order being the last on the PON to close.</p>	3Q07	NA	NA	2008	<p>The fact that R orders often are the last order on the PON to close and typically close after the due date continue to cause an out of compliant situation on this measure. The issue with closing dates not being received from ARC into IRES is being addressed by IT. Management responsible for clearing errors is coaching associates on error resolution process. The NEAC has been notified of the importance of correcting errors as soon as they happen rather than correcting them all at once before month end.</p>