State of Florida

Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: April 22, 2010

TO: Ann Cole, Commission Clerk, Office of Commission Clerk

FROM: Jerry M. Hallenstein, Government Analyst II, Office of Auditing and Performance Analysis

RE: Docket No. 090430-TP – Amended petition for verified emergency injunctive relieve and request to restrict or prohibit AT&T from implementing its CLEC OSS-related releases, by Saturn Telecommunications Services, Inc.

Please file the attached correspondence in Docket No. 090430-TP.

COMMISSIONERS:
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Public Service Commission

April 22, 2010

MaryRose Sirianni
Regulatory Liaison
AT&T
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556

RE: Docket No. 090430-TP, Audit of AT&T's Local Service Request Exchange (LEX) and Local Exchange Navigation Systems (LENS) OSS Interfaces

Dear Ms. Sirianni:

On April 1, 2010, AT&T filed a response to staff's draft *Audit of AT&T's Local Service Request Exchange (LEX) and Local Exchange Navigation Systems (LENS) OSS Interfaces*. In the letter, AT&T agreed to follow staff's recommendations set forth in Section 1.5 of the audit report and provided a response to one specific staff recommendation. The recommendation is for AT&T to conduct LEX volume testing in the production environment, or otherwise prove the capacity in the production environment is adequate in the Southeast back-end systems. AT&T stated that the back-end systems utilized when placing orders through LEX are the same back-end systems that currently support LENS as well as other ordering systems. Hence, AT&T believes this demonstrates that AT&T's back-end systems are currently capable of handling high volumes of orders through the LEX interface.

Staff's concern with LEX's ability to handle high volumes is due in part to AT&T's Test Summary for the LEX Volume Testing. On page 7 of the Test Summary, AT&T observed that "insufficient resources in the backend systems and majority of errors were due to a backend system being unavailable." Staff appreciates AT&T's prompt response to staff's concern; however, staff requests that AT&T provide additional information regarding LEX and volume testing. Specifically, staff requests the following:

1. What has AT&T done to correct backend "insufficient resources" that caused slow response times in the test run?

2. What backend system was unavailable, and if AT&T knew the system was unavailable, why would AT&T would proceed with LEX volume testing?

3. AT&T claims that volume testing failed because the back-end systems were not robust. If the same back-end systems are used to support the large volume of orders

submitted via AT&T's other ordering interfaces, please explain why the back-end systems were not robust enough to handle LEX volume testing.

Additionally, on April 16, 2010, AT&T filed a response to the remaining recommendations in staff's audit report. With regards to AT&T's response to staff's recommendation for a root cause analysis for the poor flow-through results, staff is confused by AT&T's response. AT&T states that its service representatives were not rejecting orders with missing Billing Account Number (BAN) fields. However, during staff's observation of the LSC service representatives in Birmingham, Alabama, on January 13, 2010, the service representative made a point about not being "allowed" to make any changes to orders. In Attachment 1 to AT&T's April 16 letter, AT&T states that the service representatives identified the CLEC BAN and issued service orders resulting in a miss to the LNP flow-through sub-measure. Staff requests the following additional information:

4.   Why are missing BAN fields an issue for LNP orders only?

5.   Please provide the March 2010 SQM/SEEM results for the O-3 Percent Flow-through Service Requests performance measurement.

AT&T believes that its response in Attachment 2 satisfies staff's audit report recommendation that AT&T update its CLEC documentation for commingled orders. Staff would like to set up a series of calls to work through Attachment 2 and STS' matrix. The first call would take place on April 29th at 3:00 p.m. E.S.T. using the bridge number 888-808-6959 and conference code 4136904#.

Staff requests that AT&T provide a response to the above questions by April 30, 2010 and further requests that AT&T file the responses in FPSC Docket No. 090430-TP. Thank you for the cooperation.

Sincerely,

Lisa S. Harvey, Assistant Director
Office of Auditing and Performance Analysis

LSH/jh

cc: Dale Mailhot
     Jerry Hallenstein
     Keith Kramer, STS Telecom