

Dorothy Menasco

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Wednesday, April 28, 2010 12:23 PM
To: Filings@psc.state.fl.us
Subject: 090430-TP AT&T Florida's Letter to Ann Cole re: Response to Staff's Letter of April 22, 2010 (follow-up questions regarding Items 1 and 2)
Importance: High
Attachments: Untitled.pdf

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 BellSouth Telecommunications, Inc. d/b/a AT&T Florida
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- B. Re: Docket No. 090430-TP: Petition for verified emergency injunctive relief and request for stay of AT&T's CLEC OSS-related releases by Saturn Telecommunications Services, Inc.
- C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida

on behalf of Tracy W. Hatch
- D. 4 pages total (includes letter and certificate of service)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Letter to Ann Cole re: Response to Staff's Letter of April 22, 2010 (follow-up

 questions regarding Items 1 and 2)

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April 28, 2010

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

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

Dear Ms. Cole:

In the staff audit report and subsequently in the FPSC order issued April 26, 2010, the Commission found that AT&T should be allowed to move forward with the retirement of the LENS interface under four conditions. AT&T responded to item 1 on April 1, 2010 and supplemented its response on April 21, 2010. AT&T also responded to items 2-4 (partial response to item 4) on April 16, 2010.

This letter is in response to the FPSC staff letter of April 22, 2010. In its letter, the staff has several follow up questions regarding item 1 (LEX volume testing) item 2 (flow through results). AT&T's responses are below.

Item No. 1: What has AT&T done to correct backend "insufficient resources" that caused slow response times in the test run?

Item No. 2: What backend system was unavailable, and if AT&T knew the system was unavailable, why would AT&T proceed with LEX volume testing?

Item No. 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.

AT&T Response 1-3: Volume testing was meant to ensure that BellSouth's (now AT&T) back-end OSS could handle the total number of orders it was anticipated would be submitted by the CLEC community through the available ordering and pre-ordering interfaces (e.g., LENS, EDI and TAG). Both the Commission and the FCC concluded that BellSouth's back-end OSS could handle the anticipated volumes that would be submitted through the various interfaces. Over time, the total volume of orders submitted by the CLECs has remained fairly constant and the back-end systems have had no issues in handling that volume. With the release of LEX and ultimate retirement of LENS, the total volume of CLEC orders traversing the back-end systems should not

significantly change. In other words, while the vehicle through which the CLEC orders are transmitted has changed (LEX in place of LENS) the overall order volume has not. Thus, the transition from LENS to LEX has no impact on the ability of the back-end OSS to process CLEC orders.

As to the use of backend systems during the testing phase of LEX, AT&T's prior response apparently (and inadvertently) left Staff with a misperception as to how this volume testing is performed. AT&T does not typically allow the system under test to flow orders to the production back-end OSS. This is to protect the normal operations in a production environment. AT&T develops a test environment to simulate the back end OSS so that volumes and more importantly, response times of the front-end system can be monitored.

During the volume testing that was done for LEX, AT&T observed that response intervals were in excess of those that would have been expected in the production environment. These extended intervals are what caused the initial "failure" of the volume test. Further analysis of the test results indicated that there were many transactions that had intervals that indicated that a "timeout" had occurred rather than a formatted response with an associated interval. This timeout was due to constraints in the test environment for the back-end system databases and interfaces. The extended intervals were handled and processed correctly by LEX; however the aggregate interval averages for overall response times were such that the test did not meet the standard when compared to the production environment. Once the timeout intervals were accounted for, the LEX application was determined be functioning appropriately and could handle the transaction volumes. A determination was made that an additional test could be run with some constraints to account for the test environments for the back-end OSS. This was done and the response intervals were within the normal ranges.


Item No. 4: Why are missing BAN fields an issue for LNP orders only?

AT&T Response: Staff correctly recalls that during the tour of the Birmingham Local service Center the Service Representative stated they are instructed not to make changes from the Local Service Request (LSR) to the Service Order that is processed and submitted to downstream systems. Making changes on behalf of CLECs can negatively impact performance measures (i.e. Service Order Accuracy and Percent Flow Through) even though the CLEC and their end users aren't harmed. Regardless, AT&T paid remedies to CLECs that did not submit BAN information and the orders were not appropriately rejected. During the Percent Flow Through Root Cause Analysis, AT&T determined that LEX was not automatically rejecting LNP LSRs that were missing the Billing Account Number data. When the LSR "exceptioned" to the Local Service Center, some Service Representatives were populating the BAN on the Service Order and sending a Firm Order Confirmation instead of rejecting the LSR. AT&T's countermeasures was to implement a mechanical edit so LEX rejects LSRs with unpopulated BAN fields and reinforcing with the Service Representatives the instructions on rejecting LSRs that have missing data.

Item No. 5: Please provide the March 2010 SQM/SEEM results for the O-3 Percent Flow-through Service Requests performance measurement.

AT&T Response: AT&T will provide its response on April 30, 2010.

Please contact me or MaryRose Sirianni at (850) 577-5553 if you have questions or need additional information.

Sincerely,

Tracy W. Hatch

cc: Gregory R. Follensbee
E. Earl Edenfield, Jr.
Lisa Harvey

CERTIFICATE OF SERVICE
Docket No. 090430-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U.S. Mail this 28th day of April, 2010 to the following:

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