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September 20, 2004

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
CLERK
ENVED-PPSC

Re: Docket No. 000121B-TP

Dear Ms. Bayó:

Enclosed is an original and 15 copies of Sprint's September 2004 Root Cause Analysis (RCA) reports 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 Sprint, which shall then be published on a monthly basis. This report is for results for the period of July 2004 through August 2004 as published in the June, July, and August reports.

A copy of the less is enclosed. Please stamp it to indicate that the original was filed and return a copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

- CMP _____
- COM _____ Susan S. Masterton
- CTR _____
- ECR _____ Enclosure
- GCL _____
- OPC _____ cc: Lisa Harvey
Jerry Hallenstein
David Rich
- MMS _____
- RCA _____
- SCR _____
- SEC 1
- OTH _____

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FPSC-COMMISSION CLERK



September 2004 Root Cause Analysis Report (reflects July 2004 data published August 20)

Florida Public Service Commission

Background

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

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders (see definition below) which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.	4Q 2003	2Q 2005 3Q 2004	30-40% of orders		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday Sprint established a group of dedicated employees to handle complex orders which require manual intervention

Measure 2: Average FOC Notice Interval Submeasure 2.01.16: All Electronic – LNP

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint's ordering system processes the manual re-queuing of the order as an electronic order when it should be an electronic/manual mix order. For instance, if an order is received by Sprint's ordering center in error and the analyst corrects the error, the analyst resubmits (original date and time are not impacted) the order so that the system can systematically complete a firm order confirmation notice to the customer.	2Q 2004	4Q 2004	TBD		A system enhancement request was submitted to appropriately include any order manually entered into the queue by an analyst in the electronic/manual mix submeasure. The request is in the level of effort stage; future updates will include the projected improvement dates and estimated impacts.

Measure 2: Average FOC Notice Interval Submeasure 2.03.01: Electronic/Manual Mix – Residential POTS



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.	4Q 2003	2Q 2005 3Q 2004	30-40% of orders		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday Sprint established a group of dedicated employees to handle complex orders which require manual intervention

Measure 2: Average FOC Notice Interval

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Measure 2: Average FOC Notice Interval

Submeasure 2.03.101: Electronic/Manual Mix - UNE P orders xDSL Provisioned

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
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Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Compliance has been impacted due to the complexity and manual intervention required for these types of orders.</p>	3Q 2004	4Q 2004	30-40% of orders		<p>Sprint has designated specific order assigners to handle these types of orders.</p>

Measure 3: Average Reject Notice Interval

Submeasure 3.03.02.01: Electronic/Manual Mix -- Content Errors -- Resale Orders

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.</p>	3Q 2003	2Q 2005 3Q 2004	30-40% of orders		<p>The action plan includes the following:</p> <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday Sprint established a group of dedicated employees to handle complex orders which require manual intervention



rs - UNE Loop

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Measure 7: Average Completed Interval
Submeasure 7.01.02: Residential POTS - No Field Work

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Cause analysis is ongoing. One cause that has already been identified as a contributor to shorter ILEC intervals is "no physical work" orders. These orders yield short ILEC intervals.	3Q 2003	4Q 2004 2Q 2004	TBD		
High order volumes have caused a backlog of orders in the NEAC. This has resulted in extended intervals due to the manual completion of orders.	3Q 2003	2Q 2005	TBD		

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan



High order volumes have caused a backlog of orders in the NEAC. This has resulted in extended intervals due to the manual completion of orders.	3Q 2003	2Q 2005	TBD		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders such as, CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday
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Measure 7: Average Completed Interval

Description of Issue	Start Date	rk		End Date	Improvement Plan
		Projected Improvement	Estimated Impact		
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.	1Q 2004	4Q 2004 2Q 2004	50-60% of days 40-50% of days 60-70% of days 40-50% of days		Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date. 2005.
Severe summer storms caused orders to be carried over.	3Q 2004	3Q 2004	10-20% of orders		This is a seasonal issue that will be resolved as weather conditions improve.

Measure 7: Average Completed Interval

Submeasure 7.11.01: UNE Loops Non-Designed – Field Work

Description of Issue	Start Date	rk		End Date	Improvement Plan
		Projected Improvement	Estimated Impact		
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.	2Q 2003	4Q 2004 2Q 2004	70-80% of days 50-60% of days 90-100% of days 10-20% of days 60-70% of days		Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date. Sprint has implemented several new processes and technologies to enable the use of UNE Loops that are located behind remote end offices. The entire process should be completed by January 1, 2005.
Severe summer storms caused orders to be carried over.	3Q 2004	3Q 2004	10-20% of orders 20-30% of orders		This is a seasonal issue that will be resolved as weather conditions improve.

Measure 7: Average Completed Interval

Submeasure 7.131.02: UNE Platform – No Field Work



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Cause analysis is ongoing. One cause that has already been identified as a contributor to shorter ILEC intervals is "no physical work" orders. These orders yield short ILEC intervals.	3Q 2003	4Q 2004 TBD	TBD		<p>The lacks of "no physical work" orders for CLEC results are inherent to the business. For example: a "no physical work" order is a "change of ownership" in which a Sprint retail customer calls Sprint and requests a change to the person billed for service (for example, when one roommate transfers the bill to another roommate's name). If a CLEC customer called a CLEC with the same request, the CLEC would handle this internally and would not submit an order to Sprint on their customer's behalf.</p> <p>A cross-functional team continues to look for opportunities of reducing CLEC intervals in order to achieve parity with ILEC intervals.</p>
High volumes of complex orders have caused a backlog of orders in the NEAC. This has resulted in extended intervals due to the manual completion of orders.	3Q 2003	2Q 2005	TBD		<p>The action plan includes the following:</p> <ul style="list-style-type: none"> Automation of complex orders such as, CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Representative errors due to inaccurate and incomplete information are causing missed due dates.	3Q 2003	4Q 2004	TBD		Order examples were sent to the appropriate centers for corrective action as well as coaching and counseling.

Measure 11: Percent of Due Dates Missed

Submeasure 11.101.01: UNE Loops x-DSL Provisioned – Field Work

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.	2Q 2003	4Q 2004 2Q 2004	20-30% of orders 30-40% of orders 40-50% of orders 20-30% of orders 30-40% of orders		<p>Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date.</p> <p>Sprint has implemented several new processes and technologies to enable the use of UNE Loops that are located behind remote end offices. The entire process should be completed by January 1, 2005.</p>



One technician group is unnecessarily referring some orders back for dispatch to a different technician team on the due date.	2Q 2004	4Q 2004 2Q 2004	10-20% of orders 30-40% of orders 10-20% of orders	July 2004	Sprint is standardizing the referral process to avoid unnecessary referrals.
Severe summer storms caused orders to be carried over.	2Q 2004	3Q 2004	40-50% of orders 20-30% of orders 10-20% of orders		This is a seasonal issue that will be resolved as weather conditions improve.

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
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.	2Q 2003	4Q 2004 2Q 2004	60-70% of orders 30-40% of orders 60-70% of orders		Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date. Sprint has implemented several new processes and technologies to enable the use of UNE Loops that are located behind remote end offices. The entire process should be completed by January 1, 2005.
Severe summer storms caused orders to be carried over.	3Q 2004	3Q 2004	20-30% of orders		This is a seasonal issue that will be resolved as weather conditions improve.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Representative errors due to inaccurate and incomplete information are causing missed due dates	3Q 2003	4Q 2004	70-80% of orders		Order examples were sent to the appropriate centers for corrective action as well as coaching and counseling.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
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<p>Troubles are being reported on some non-dispatched orders. Non-dispatchable orders automatically flow through provisioning systems and are completed with no indication of any trouble condition until a customer calls. For example there may be a disconnected jumper at the site. In these situations the CLEC will contact Sprint to report a trouble.</p>	4Q 2003	4Q 2004	<p>70-80% of trouble tickets 80-90% of trouble tickets 85-95% of trouble tickets</p>	<p>Non-dispatchable orders meeting certain criteria are being dispatched to ensure service is provided. Data is being accumulated to identify actionable causes for troubles. Corrective actions will be implemented as appropriate. Sprint is also investigating potential ideas for ameliorating the impact of small CLEC volumes in cases where low CLEC ticket volume may decrease the effectiveness of the statistical parity comparisons.</p> <p>Sprint implemented a process to automate ticket submission to technicians via a hand held device. However, some orders were not getting to the Central Office technicians via the hand held device. ARC (Automated Routing Completion) was inadvertently closing some orders. The non-worked orders caused Sprint to experience an increase in trouble activity. These orders were all sent via printers in the last week of April until the hand held devices could be fixed.</p> <p>Sprint is in the process of identifying wire centers where chronic non-compliance exists. Once a wire center is deemed 'chronic', which includes per 100 and repeats (mostly cleared to outside plant or high level disposition for facilities), Sprint plans to upgrade those facilities.</p> <p>Sprint is also performing refresher training in the districts to improve accuracy of closing troubles related to defective/deteriorated cable.</p>
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Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Technicians are not uploading tasks upon completion within the 20-minute objective.	3Q 2004	4Q 2004	40-50% of orders		Technician information was sent to the Administrative Managers for corrective action.
Representative errors caused orders to fail completion on the due date.	3Q 2004	4Q 2004	10-20% of orders		Order examples were sent to the appropriate centers for corrective action as well as coaching and counseling.
Representatives failed to re-due date SOE orders associated with CIRAS orders when CIRAS orders were completed after the due date.	3Q 2004	4Q 2004	10-20% of orders		Order examples were sent to the appropriate centers for corrective action as well as coaching and counseling.
CLAS (Customer Loop Assignment System) errors were routing to the wrong department and not being worked, preventing completion on the due date.	3Q 2004	3Q 2004	1-10% of orders		A table change was made in July to ARC (Automatic Routing System) to correct this issue.

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Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Service center workload is shifting to order types which require additional manual intervention. This is preventing the clearing of errors on orders prior to the due date.	3Q 2004	1Q 2005	70-80% of orders 80-90% of orders		Several initiatives have been implemented to balance the workload in the service centers. These include streamlining current processes and resource management.
Due to a keyword issue, orders with 10-digit triggers are not completed on the due date.	3Q 2004	3Q 2004	1-10% of orders		A new process was implemented in August 2004. If an order has a specific keyword related to 10-digit trigger, the order will be automatically completed.

Submeasure 19.11: UNE Loops Non-designed

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Troubles are being reported on some non-dispatched orders. Non-dispatchable orders automatically flow through provisioning systems and are completed with no indication of any trouble condition until a customer calls. For example there may be a disconnected jumper at the site. In these situations the CLEC will contact Sprint to report a trouble.	2Q 2004	2Q 2005 3Q 2004	50-60% of trouble tickets		<p>Non-dispatchable orders meeting certain criteria are being dispatched to ensure service is provided. Data was accumulated to identify causes for troubles and provided to the field teams for appropriate corrective action plans. Sprint is doing additional analysis to target specific problem areas.</p> <p>Sprint implemented a process to automate ticket submission to technicians via a hand held device. However, some orders were not getting to the Central Office technicians via the hand held device. ARC (Automated Routing Completion) was inadvertently closing some orders. The non-worked orders caused Sprint to experience an increase in trouble activity. These orders were all sent via printers in the last week of April until the hand held devices could be fixed.</p> <p>Sprint is in the process of identifying chronic wire centers. Once a wire center is deemed 'chronic', which includes per 100 and repeats (mostly cleared to outside plant or high level disposition for facilities), Sprint plans to upgrade those facilities.</p> <p>Sprint is also performing refresher training in the districts to improve accuracy of closing troubles related to defective/deteriorated cable.</p>

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan



<p>Troubles are being reported on some non-dispatched orders. Non-dispatchable orders automatically flow through provisioning systems and are completed with no indication of any trouble condition until a customer calls. For example there may be a disconnected jumper at the site. In these situations the CLEC will contact Sprint to report a trouble.</p>	2Q 2004	4Q 2004 2Q 2004	70-80% of trouble tickets 30-40% of trouble tickets 70-80% of trouble tickets	<p>Non-dispatchable orders meeting certain criteria are being dispatched to ensure service is provided. Data was accumulated to identify causes for troubles and provided to the field teams for appropriate corrective action plans. Sprint is doing additional analysis to target specific problem areas.</p> <p>Sprint implemented a process to automate ticket submission to technicians via a hand held device. However, some orders were not getting to the Central Office technicians via the hand held device. ARC (Automated Routing Completion) was inadvertently closing some. The non-worked orders caused Sprint to experience an increase in trouble activity. These orders were all sent via printers in the last week of April until the hand held devices could be fixed.</p> <p>Sprint is in the process of identifying wire centers where chronic non-compliance exists. Once a wire center is deemed 'chronic', which includes per 100 and repeats (mostly cleared to outside plant or high level disposition for facilities), Sprint plans to upgrade those facilities.</p> <p>Sprint is also performing refresher training in the districts to improve accuracy of closing troubles related to defective/deteriorated cable.</p> <p>A new defective cable program will be implemented in 2005.</p>
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Measure 19: Customer Trouble Report Rate					
Submeasure 19.147: EELS					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Several issues impacting compliance are related to defective equipment, lightning damage, cable issues, and Sprint employee error.</p>	3Q 2004	1Q 2005	20% of trouble tickets		<p>Equipment and infrastructure maintenance issues continue to be a company-wide priority. It is standard Sprint policy to repair or replace properties identified as sub-standard whenever appropriate. However, many network outages can not be determined until they occur on an individual basis as opposed to an overall network problem. Sprint has been replacing older equipment with new HDSL equipment as a nation-wide initiative.</p> <p>Employee caused errors are addressed on an individual coaching and counseling level.</p>

Measure 20: Percentage of Customer Trouble Not Resolved Within Estimated Time					
Submeasure 20.101.01: Residential POTS - Dispatch					



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Heavy workload due to severe weather caused missed commits.	3Q 2004	4Q 2004	70-80% of trouble tickets		This is a seasonal issue that will be resolved as weather conditions improve.

Measure 39: E911 MS Database Update Interval
Submeasure 39.02: Direct Gateway Input

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
CLECs forwarded incorrect database function codes to Sprint. Some of these errors were corrected by Sprint representatives instead of being returned to the CLEC. This contributed to the non-compliance.	2Q 2004	3Q 2004	80-85% of record updates 90-95% of record updates		Sprint implemented a process on July 12th that automatically rejects and returns (echo-back) the CLEC records when they contain improper function codes and/or fail master street address guide (MSAG) edits as determined by that county. Notification regarding this process was communicated to all CLECs July 1, 2004.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Due to increases in 2004 CLEC order volumes and significant manual order intervention, more resources were required to process orders. This resulted in an increase in response times from under 20 seconds to more than 60 seconds.	3Q 2004	4Q 2004	TBD		Sprint is in the process of drafting a letter to all CLECs describing how CLECs can help improve the ordering process. This is expected to decrease the amount of calls coming into the service centers and also decrease the current response time. Analysis indicates that about 35-45% of the calls that come into the center are for information the CLECs are able to view online in IRES.