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February 21, 2005

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

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RE: Docket No. 000121B-TP

Dear Mrs. Bayó:

Enclosed is an original and 15 copies of Sprint's February 2005 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 Sprint, which shall then be published on a monthly basis. This report is for results for the period of October 2004 through December 2004 as published in the November, December and January reports.

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

Sincerely,

CMP _____
COM _____ *Susan S. Masterton*

CTR _____ Susan S. Masterton

ECR _____
GCL _____ Enclosures

OPC _____ cc: Lisa Harvey
MMS _____ Jerry Hallenstein
David Rich

RCA _____
SCR _____
SEC L
OTH _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail to all known parties of record this 21st day of February, 2005.

**Felicia Banks
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850**

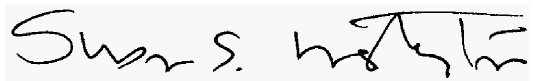
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Susan S. Masterton



February 2005 Root Cause Analysis Report (reflects December 2004 data published January 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.

* **Definition of Project Orders:** Service requests that exceed the line size and/or level of complexity that would allow for the use of standard ordering and provisioning processes. Generally, due dates for projects are negotiated, coordination of service installations/changes is required and automated provisioning may not be practical.

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
<p>Sprint's ordering system includes some manually handled orders in the All Electronic submeasure when they should be included in the Electronic/Manual Mix submeasure. The manual efforts are causing Sprint to miss the benchmark for the All Electronic submeasure.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from 2003.</p>	2Q 2004	1Q 2005 4Q 2004	TBD		<p>A system enhancement is scheduled to be implemented in February 2005 to appropriately include all manually handled orders into the Electronic/Manual Mix submeasure.</p> <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.</p>

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
<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates. Examples of these orders in include large projects and CLEC-to-CLEC conversions.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from 2003.</p>	4Q 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 is scheduled to be implemented in February 2005. This project will help automate approximately 35% of the orders that require manual intervention. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention. <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The</p>



					National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.
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Measure 2: Average FOC Notice Interval
Submeasure 2.03.02: Electronic/Manual Mix – Business POTS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates. Examples of these orders in include large projects and CLEC-to-CLEC conversions.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from 2003.</p>					<p>The action plan includes the following:</p> <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions is scheduled to be implemented in February 2005. This project will help automate approximately 35% of the orders that require manual intervention. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention. <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.</p>

Measure 2: Average FOC Notice Interval
Submeasure 2.03.101: Electronic/Manual Mix - UNE Loops xDSL Provisioned

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates. Examples of these orders in include large projects and CLEC-to-CLEC conversions.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from 2003.</p>	4Q 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 is scheduled to be implemented in February 2005. This project will help automate approximately 35% of the orders that require manual intervention. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention. <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.</p>

Measure 2: Average FOC Notice Interval
Submeasure 2.03.11: Electronic/Manual Mix – UNE Loops – Non Designed



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates. Examples of these orders in include large projects and CLEC-to-CLEC conversions.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from 2003.</p>	4Q 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 is scheduled to be implemented in February 2005. This project will help automate approximately 35% of the orders that require manual intervention. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.</p>

Measure 2: Average FOC Notice Interval

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates. Examples of these orders in include large projects and CLEC-to-CLEC conversions.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from 2003.</p>	2Q 2004	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 is scheduled to be implemented in February 2005. This project will help automate approximately 35% of the orders that require manual intervention. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.</p>

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates.</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



<p>Examples of these orders include large projects and CLEC-to-CLEC conversions.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from</p>				<p>conversions is scheduled to be implemented in February 2005. This project will help automate approximately 35% of the orders that require manual intervention.</p> <ul style="list-style-type: none"> Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.</p>
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rs – UNE Loops and Ports

Description of Issue	Start Date	Projected	Estimated Impact	End Date	Improvement Plan
<p>manual intervention by ordering center associates. Examples of these orders include large projects and CLEC-to-CLEC conversions.</p> <p>Sprint continues to experience an increase in order volumes, which are up 11% in 2004.</p> <p>Sprint continues to experience an increase in order volumes. December order volumes were up 22.8% from 2003.</p>			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 is scheduled to be implemented in February 2005. This project will help automate approximately 35% of the orders that require manual intervention. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention <p>Sprint is performing analysis to determine how to assign and work the orders prior to missing FOC or rejection timeframes. The National Exchange Access Center (NEAC) ordering center added additional analysts and completed a training session with the goal of improving response times.</p>

Submeasure 7.01.02: Residential POTS – No Field Work

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Retail orders have a higher frequency of same day due dates compared to CLEC orders, which is primarily due the types of orders submitted by retail and CLEC customers.</p>	3Q 2003	1Q 2005 4Q 2004 2Q 2004	TBD		<p>Sprint is considering modifications to the measurement plan to improve the comparison between retail and CLEC orders (for example: exclude feature only orders) or converting to a benchmark measurement for certain submeasures. Implementation of this issue has been delayed since Sprint does not expect to propose any changes to the Florida Performance Measurement Plan until 2006.</p>



Sprint ordering center representatives keyed a few orders late, which caused longer provisioning intervals.	3Q 2003	2Q 2005	TBD	To improve efficiency at the NEAC, Sprint developed a process to ensure that all orders are assigned to analysts by a designated assigner.
For orders requesting CLEC-to-CLEC conversions, Sprint's Integrated Request Entry System (IRES) does not systematically create the necessary orders. Therefore, ordering center representatives must manually create the orders required to complete the conversion.	4Q 2004	2Q2005	TBD	A system enhancement is scheduled for February 2005 to automate the CLEC-to-CLEC conversion process.

Measure 7: Average Completed Interval

Submeasure: 7.101.01: UNE Loops xDSL Provisioned – Field Work

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint cannot currently identify UNE loops behind remote end offices prior to dispatch, which is causing extended intervals and double dispatches.	1Q 2004	4Q 2004 2Q 2004	40-50% of days 20-30% of days 70-80% of days 50-60% of days		Sprint is taking the following actions to resolve this issue: <ul style="list-style-type: none"> Sprint implemented Time Slot Interchanger (TSI) technology where feasible and trained associates as of December 31, 2004. This technology will allow Sprint to identify these situations and avoid extended intervals and double dispatches. Sprint implemented process changes in November 2004 to decrease the interval for identifying facilities for all orders to four days from six days. This allows Sprint to meet original due dates.
For orders requesting CLEC-to-CLEC conversions, Sprint's Integrated Request Entry System (IRES) does not systematically create the necessary orders. Therefore, ordering center representatives must manually create the orders required to complete the conversion.	4Q 2004	1Q2005	TBD		A system enhancement is scheduled for February 2005 to automate the CLEC-to-CLEC conversion process.

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
Retail orders have a higher frequency of same day due dates compared to CLEC orders, which is primarily due the types of orders submitted by retail and CLEC customers.	3Q 2003	4Q 2004 TBD	TBD		Sprint is considering modifications to the measurement plan to improve the comparison between retail and CLEC orders (for example: exclude feature only orders) or converting to a benchmark measurement for certain submeasures.



For orders requesting CLEC-to-CLEC conversions, Sprint's Integrated Request Entry System (IRES) does not systematically create the necessary orders. Therefore, ordering center representatives must manually create the orders required to complete the	4Q 2004	1Q2005	TBD		A system enhancement is scheduled for February 2005 to automate the CLEC-to-CLEC conversion process.
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Submeasure 11.101.01: UNE Loops x-DSL Provisioned – Field Work					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint cannot currently identify UNE loops behind remote end offices prior to dispatch, which is causing extended intervals and double dispatches.	2Q 2003	4Q 2004 2Q 2004	40-50% of orders 30-40% of days 20-30% of orders 30-40% of orders 20-30% of orders		Sprint is taking the following actions to resolve this issue: <ul style="list-style-type: none"> Sprint implemented Time Slot Interchanger (TSI) technology where feasible and trained associates as of December 31, 2004. This technology will allow Sprint to identify these situations and avoid extended intervals and double dispatches. Sprint implemented process changes in November 2004 to decrease the interval for identifying facilities for all orders to four days from six days. This allows Sprint to meet original due dates.

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
Sprint cannot currently identify UNE loops behind remote end offices prior to dispatch, which is causing extended intervals and double dispatches.	2Q 2003	4Q 2004 2Q 2004	50-60% of orders 30-40% of orders 40-50% of orders 60-70% of orders 30-40% of orders 60-70% of orders		Sprint is taking the following actions to resolve this issue: <ul style="list-style-type: none"> Sprint implemented Time Slot Interchanger (TSI) technology where feasible and trained associates as of December 31, 2004. This technology will allow Sprint to identify these situations and avoid extended intervals and double dispatches. Sprint implemented process changes in November 2004 to decrease the interval for identifying facilities for all orders to four days from six days. This allows Sprint to meet original due dates.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
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Sprint technicians were not uploading tasks immediately after order completion. Some temporary Sprint contractors working during the hurricane recovery period did not have the handheld devices required to electronically close the orders.	3Q 2004	4Q 2004	40-50% of orders 30-40% of orders 40-50% of orders		Sprint developed a Technician Upload Report that is used by supervisors to provide coaching and corrective action for technicians who are not closing orders on a timely basis.
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Measure 18: Average Completion Notice Interval
Submeasure 18.03: Electronic/Manual Mix

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Relational errors on orders listed on the passed due report are not cleared within the 24-hour objective.	3Q 2004	1Q 2005	70-80% of orders 80-90% of orders 70-80% of orders 80-90% of orders		Sprint has identified possible system issues which are causing the relational issues, a system enhancement went in during December. Sprint will not know the impacts until February or March.

Measure 19: Customer Trouble Report Rate
Submeasure 19.147: EELS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
There are comparison issues between retail and CLEC circuits with this particular product type.	3Q 2004	1Q 2005	20% of trouble tickets		Sprint is considering modifications to the measurement plan to improve the comparison between retail and CLEC customer trouble report rates. Sprint technicians and engineers are conducting additional analysis to look at the EELS product type, to determine why this failure rate is higher. Additionally, we will be looking at locations based on wire centers and termination locations to see possible patterns of failure in specific areas.

Measure 20: % of Customer Trouble Not Resolved within Estimated Time
Submeasure 20.101.02: UNE Loops xDSL Provisioned - No Dispatch

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint found that tickets were picked up after the commit date/time.	4Q 2004	4Q2004	100%		As restoration and clean-up efforts improve, Sprint will be able to meet their commit date/times.

Measure 31: Usage Completeness
Submeasure 31.04 Facilities/Interconnection

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
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<p>In August 2004, Sprint generated access bills for usage charges at least 2 days after the bill date. Beginning in September 2004, Sprint began to gradually accelerate the bill schedule, to allow more time for bill verification. By November 2004, most bills were being generated on the bill date causing two days of usage to miss the bill, which caused some CLECs to be non-compliant.</p>	4Q 2004	1 Q 2005			<p>Beginning in January 2005, the bill schedule was adjusted again to produce access bills at least one day after the bill date. Sprint expects measurement results to improve with the February results, which are published in March.</p>
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Measure 32: Recurring Charge Completeness					
Submeasure 32.02: UNE					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint conducted analysis on Measures 32 and 33 and determined that the NEAC was not properly coding corrective orders with effective billing dates.</p>					<p>These orders should be excluded from the results per Sprint's Florida Performance Measurement Plan. Beginning in February, the NEAC will accurately code corrective orders. Sprint is anticipating improvements for both Measures 32 and 33 in March 2005 results.</p>

Measure 33: Non-Recurring Charge Completeness					
Submeasure 33.02: UNE					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint conducted analysis on Measures 32 and 33 and determined that the NEAC was not properly coding corrective orders with effective billing dates.</p>					<p>These orders should be excluded from the results per Sprint's Florida Performance Measurement Plan. Beginning in February, the NEAC will accurately code corrective orders. Sprint is anticipating improvements for both Measures 32 and 33 in March 2005 results.</p>

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates, which impacts other areas. Examples of these orders include large projects and CLEC-to-CLEC conversions.</p>	3Q 2004	4Q 2004	TBD	12-31-2004	<p>Sprint collaborated with CLECs that have the highest call volumes to discuss improvements to the ordering process. Sprint's analysis indicates about 35-45% of the calls from CLECs are related to information that can be viewed online in IRES.</p>