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April 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

RE: Docket No. 000121B-TP

Dear Mrs. Bayó:

Enclosed is an original and 15 copies of Sprint's April 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 December 2004 through February 2005 as published in the January, February and March 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
- CTR
- ECR
- GCL
- OPC
- MMS
- RCA
- SCR
- SEC
- OTH


Susan S. Masterton

Enclosures

cc: Lisa Harvey
Jerry Hallenstein
David Rich

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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 April , 2005.

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

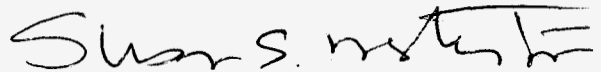
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Susan S. Masterton



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April 2005 Root Cause Analysis Report (reflects February 2005 data published March 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 2.03.02: Electronic/Manual Mix – Business POTS					
Description of Issue			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 include large projects and CLEC-to-CLEC conversions.</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 expects to experience improvements in March 2005 provided there are no system issues. 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 continues to experience an increase in order volumes. February 2005 order volumes increased by 13,000 orders over 2004, which is a 37% increase.</p>	1Q 2005				<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. The NEAC will continue to monitor order volumes. If they continue to increase at this rate an addition increase to staff will be considered.</p>

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
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<p>Sprint is experiencing an increase in orders that require manual intervention by ordering center associates. Examples of these orders include large projects and CLEC-to-CLEC conversions.</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 expects to experience improvements in March 2005 provided there are no system issues. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention.
	1Q 2005				

Measure 2: Average FOC Notice Interval					
Submeasure 2.03.11: Electronic/Manual Mix – UNE T oops – N t 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 include large projects and CLEC-to-CLEC conversions.</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 expects to experience improvements in March 2005 provided there are no system issues. Sprint is in the early stages of planning for a system enhancement to automate certain supplemental orders in IRES to further reduce manual intervention.
	1Q 2005				

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 orders that require manual intervention by ordering center associates. Examples of these orders include large projects and CLEC-to-CLEC conversions.</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 expects to experience improvements in March 2005 provided there are no system issues. 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 continues to experience an increase in order volumes. February 2005 order volumes increased by 13,000 orders over 2004, which is a 37% increase.</p>	1Q 2005				<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. The NEAC will continue to monitor order volumes. If they continue to increase at this rate an addition increase to staff will be considered.</p>

Measure 3: Average Reject Notice Interval
Submeasure 3.03.02.02: Electronic/Manual Mix – Content Error – UNE Loop and Ports

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 include large projects and CLEC-to-CLEC conversions.</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 expects to experience improvements in March 2005 provided there are no system issues. 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 continues to experience an increase in order volumes. February 2005 order volumes increased by 13,000 orders over 2004, which is a 37% increase.</p>	1Q 2005				<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. The NEAC will continue to monitor order volumes. If they continue to increase at this rate an addition increase to staff will be considered.</p>



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
Retail orders have a higher frequency of same day due dates compared to CLEC orders, which is primarily due to the types of orders submitted by retail and CLEC customers.	3Q 2003	1Q2006 1Q 2005 4Q 2004 2Q 2004	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. Implementation of this issue has been delayed since Sprint does not expect to propose any changes to the Florida Performance Measurement Plan until 2006.
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 skill set to decrease errors, and increase timeliness.
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	February 2005	A system enhancement is scheduled for February 2005 to automate the CLEC-to-CLEC conversion process. Sprint expects to experience improvements in March 2005 provided there are no system issues.

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	2Q2005 1Q2005 4Q 2004 2Q 2004	30-40% of Days		<p>Sprint is taking the following actions to resolve this issue:</p> <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. <p>The indicators used to identify UNE loops behind remote end offices were initially loaded into Sprint's systems. However, the indicators will be re-loaded in March due to verification issues. Once the codes are loaded, Sprint will begin training for the Sprint CLEC provisioning center and provide additional training on the TSI product for field technicians. Sprint expects to experience improved provisioning intervals for these types of UNE loops beginning 2Q 2005.</p>



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	February 2005	A system enhancement is scheduled for February 2005 to automate the CLEC-to-CLEC conversion process. Sprint expects to experience improvements in March 2005 provided there are no system issues.
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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	3Q2006 4Q2006 4Q 2004 TBD	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.</p> <p>The improvement plan will be delayed until mid-2006 since changes are recommended for the Florida Performance Measurement Plan to resolve issues with this measure. Sprint does not expect to propose any changes prior to mid-2006 due to requirements in the Nevada performance measurement stipulation that allows Sprint to propose changes in January 2006. Potential changes to this measure include adding a benchmark measurement for feature only orders.</p>
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	February 2005	A system enhancement is scheduled for February 2005 to automate the CLEC-to-CLEC conversion process.

Measure 11: Percent of Due Dates Missed
Submeasure 11.101.01: UNE Loops x-DSL Provision 1 – 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	1Q2005 4Q2005 4Q 2004 2Q 2004	20-30% of Orders		<p>Sprint is taking the following actions to resolve this issue:</p> <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. The indicators used to identify UNE loops behind remote end offices were initially loaded into Sprint's systems. However, the indicators will be re-loaded in March due to verification issues. Once the codes are loaded, Sprint will begin training for the Sprint CLEC provisioning center and provide additional training on the TSI product for field technicians. Sprint expects to experience improved provisioning intervals for these types of UNE loops beginning 2Q 2005.
Service orders missed commitments due to Sprint prioritizing trouble reports due to weather related accidents over service orders, causing non-compliance during February.	1Q 2005	2Q 2005	40-50% of Orders		Sprint's policy is to prioritize out of service troubles over service orders; therefore service order commitment may be missed due to the increased volumes of trouble tickets. Sprint increased technician overtime in the Central and South Florida areas to reduce workload and meet commitments for service orders and trouble tickets.

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	2Q2005 1Q2005 4Q 2004 2Q 2004	40-50% of orders		<p>Sprint is taking the following actions to resolve this issue:</p> <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. <p>The indicators used to identify UNE loops behind remote end offices were initially loaded into Sprint's systems. However, the indicators will be re-loaded in March due to verification issues. Once the codes are loaded, Sprint will begin training for the Sprint CLEC provisioning center and provide additional training on the TSI product for field technicians. Sprint expects to experience improved provisioning intervals for these types of UNE loops beginning 2Q 2005.</p>
Service orders missed commitments due to Sprint prioritizing trouble reports due to weather related accidents over service orders, causing non-compliance during February.	1Q 2005	2Q 2005	40-50% of Orders		Sprint's policy is to prioritize out of service troubles over service orders; therefore service order commitment may be missed due to the increased volumes of trouble tickets. Sprint increased technician overtime in the Central and South Florida areas to reduce workload and meet commitments for service orders and trouble tickets.



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Analysis for the past three months reveals 41% of troubles were related to incorrect records, 26% to technician errors, 13% to missing/broken jumpers and 6% to defective cards. Sprint has not yet determined the issue(s) causing non-compliance. Additional information will be provided in the report for March service results.	1Q2005	TBD	TBD		Sprint is in the process of developing an improvement plan for this issue. Additional information will be provided in the report for March service results.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Manual errors from various centers contributed to non-compliance.	1Q 2005	1Q 2005	30-40% of orders 66% of minutes	February 2005	Certain orders were referred to supervisors for corrective action.
A Service Order Entry (SOE) outage contributed to non-compliance.	1Q 2005	1Q 2005	10-20% of orders 22% of minutes	February 2005	The outage was temporary and the system issues have been resolved.

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	3Q2006 1Q-2005	20% of trouble tickets		<p>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.</p> <p>The improvement plan will be delayed until mid-2006 since changes are recommended for the Florida Performance Measurement Plan to resolve issues with this measure. Sprint does not expect to propose any changes prior to mid-2006 due to requirements in the Nevada performance measurement stipulation that allows Sprint to propose changes in January 2006.</p>



Measure 20: % of Customer Trouble Not Resolved within Estimated Time

ch					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Over the past 3 months, the Central and South Florida areas encountered a steady increase in seasonal visitors. This seasonal influx, combined with a residual effect of latent troubles caused by various weather issues, resulted in a significant increase in both service order and trouble ticket volumes. The increased volumes resulted in missed commitments.	1Q2005	1Q2005	100%		Sprint increased technician overtime in the Central and South Florida areas to address the increased volumes and improve the intervals for both service orders and trouble tickets.

Measure 20: % of Customer Trouble Not Resolved within Estimated Time

spatch					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Over the past 3 months, the Central and South Florida areas encountered a steady increase in seasonal visitors. This seasonal influx, combined with a residual effect of latent troubles caused by various weather issues, resulted in a significant increase in both service order and trouble ticket volumes. The increased volumes resulted in missed commitments.	4Q 2004	1Q2005 4Q2004	100%		Sprint increased technician overtime in the Central and South Florida areas to address the increased volumes and improve the intervals for both service orders and trouble tickets.

Measure 31: Usage Completeness
Submeasure 31.04 Facilities/Interconnection

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
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.	4Q 2004	1Q 2005	TBD	February 2005	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.
Some billing issues were triggered by one large CLEC in Florida (who also operates as an interexchange carrier) ordering 12 trunks with the incorrect Carrier Identification Code. Efforts to correct the billing of IXC traffic at incorrect lower CLEC rates caused usage for this CLEC to accumulate on the error file beginning with usage recorded 10/21/04. The billing	1Q 2005	1Q 2005		March 2005	This was a one time issue and this measure was compliant in March.



of this previously erred usage in February caused this CLEC and the CLEC aggregate results to be non-compliant for the month of February 2005.					
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Measure 39: E911 Database Update

Submeasure 39.01: Service Order Updates

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Some orders were received on weekends causing Sprint to miss the 48-hour update timeframe. Some orders required additional information from the county 911 coordinator. The response from the coordinator exceeded the 48 hours required for Sprint to process the updates.	1Q2005	TBD	TBD		Sprint does not provide staffing for this process on weekends. Sprint is considering making a proposal in 2006 to exclude weekend hours from the Florida Performance Measurement Plan.
Sprint closed certain orders for resale services in an inappropriate sequence for the 911 database.	1Q2005	2Q 2005			The orders were referred to supervisors for corrective action.

Submeasure 39.02: Direct Gateway Input

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Some CLECs submit orders prior to the due date. This creates a delay until a disconnected ("unlock") record is received from either the CLEC or Sprint.	1Q2005	TBD	TBD		Sprint is considering a change to the Florida Performance Measurement Plan to exclude function codes associated with local number portability.