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May 24, 2006

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Ms. 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 for filing on behalf of Embarq Florida, Inc. d/b/a Sprint Florida f/k/a Sprint-Florida, Incorporated is an original and 2 copies of Embarq's May 2006 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 January 2006 through March 2005 as published in the February, March and April 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 _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- OTH _____

Susan S. Masterton
Susan S. Masterton
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Enclosures

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DOCUMENT NUMBER-DATS

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FPSC-COMMISSION CLERK

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 24th day of May, 2006.

Felicia Banks
Florida Public Service Commission
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Tallahassee, FL 32399-0850

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Susan S. Masterton

sak

Susan S. Masterton



May 2006 Root Cause Analysis Report (reflects March 2006 data published April 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, Embarq shall provide a report of root cause analysis on a monthly basis. Embarq's root cause analysis shall include a plan for corrective action with key activities and anticipated completion dates for implementation.

Measure 2: Average FOC Notice Interval					
Sub measure 02.03.01: Electronic/Manual Mix - Residential POTS					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Embarq continues to experience an increase in order volumes. Order volumes for March 2006 were 44% higher than March 2005.	1Q 2006	2Q 2006	85%		Embarq developed a process model to systematically assign and prioritize orders. The new process is currently implemented <i>full time</i> to assess the benefits. This process allows Embarq to determine the most efficient way to assign and work orders in a manner that will ensure meeting FOC and rejection notice timeframes, as well as call answer time.

Measure 2: Average FOC Notice Interval					
Sub measure 02.03.02: Electronic/Manual Mix - Business POTS					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Embarq continues to experience an increase in order volumes. Order volumes for March 2006 were 44% higher than March 2005.	4Q 2005	2Q 2006	30-40%		Embarq developed a process model to systematically assign and prioritize orders. The new process is currently implemented <i>full time</i> to assess the benefits. This process allows Embarq to determine the most efficient way to assign and work orders in a manner that will ensure meeting FOC and rejection notice timeframes, as well as call answer time.

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
Due to increased order volumes, some orders are not assigned to a service center representative for investigation in time to meet the reject notice interval.	2Q 2004	2Q 2006 4Q 2005 2Q 2005 3Q 2004	30-40% of orders		Embarq developed a process model to systematically assign and prioritize orders. The new process is currently implemented <i>full time</i> to assess the benefits. This process allows Embarq to determine the most efficient way to assign and work orders in a manner that will ensure meeting FOC and rejection notice timeframes, as well as call answer time.

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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
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	3Q 2006 1Q 2006 1Q 2005 4Q 2004 2Q 2004	50% of days		Embarq has found that most CLEC orders do not meet the criteria for same day intervals. Embarq is investigating a change to the criteria for same day intervals which would allow more orders to complete on the day they are received, such as orders for feature changes.

Measure 7: Average Completed Interval					
Submeasure 7.02.02: Business 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.	1Q 2006	3Q 2006	50% of days		Embarq has found that most CLEC orders do not meet the criteria for same day intervals. Embarq is investigating a change to the criteria for same day intervals which would allow more orders to complete on the day they are received, such as orders for feature changes.

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
Embarq cannot currently identify UNE loops behind remote end offices prior to dispatch, which is causing extended intervals and double dispatches.	1Q 2004	2Q 2006 4Q 2005 2Q 2005 1Q 2005 4Q 2004 2Q 2004	40-50% of orders 20-30% of orders 60-70% of days		During implementation of a process to identify UNE Loops behind remote end offices in September 2005, Embarq discovered that many of the indicators used to identify UNE Loops behind remote end offices were inaccurate. The data is now correct and the indicators are currently in use however positive results are not expected until 2Q 2006. Embarq is closely monitoring results to ensure the fix is sufficient to restore compliance. Follow up meeting will be held 5/26/06 to assess performance and enact any necessary changes.
Needless referrals by contractors caused missed due dates.	4Q 2005	1Q 2006	10-20% of orders		Embarq plans to hire more full-time technicians.

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
Embarq cannot currently identify UNE loops behind remote end offices prior to dispatch, which is causing extended intervals and double dispatches.	1Q 2004	2Q 2006 4Q 2005 2Q 2005 1Q 2005 4Q 2004 2Q 2004	70-80% of orders 60-70% of days		During implementation of a process to identify UNE Loops behind remote end offices in September 2005, Embarq discovered that many of the indicators used to identify UNE Loops behind remote end offices were inaccurate. The data is now correct and the indicators are currently in use however positive results are not expected until 2Q 2006. Embarq is closely monitoring results to ensure the fix is sufficient to restore compliance. Follow up meeting will be held 5/26/06 to assess performance and enact any necessary changes.

Measure 17a: Percentage of Troubles within 5 days for New Orders
Submeasure 17a.01: Residential POTS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
A disproportionate number of CLEC customers are reporting facilities issues than ILEC customers.	2Q 2005	2Q 2006 1Q 2006 4Q 2005 3Q 2005	96% of trouble tickets		Extensive analysis is underway to decrease the frequency of troubles in the first 5 days after order completion. Embarq continues to emphasize completion testing on service orders and is replacing outside plant cables that contribute to trouble tickets. Embarq is also reaching out to CLECs with high levels of troubles to further investigate the issue. Embarq is reviewing internal reporting procedures that may affect the way dispatched tickets are counted on the Embarq side.

Measure 17a: Percentage of Troubles within 5 days for New Orders
Submeasure 17a.101: UNE Loops xDSL Provisioned

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
A disproportionate number of CLEC customers are reporting facilities issues than ILEC customers.	4Q 2005	2Q 2006 1Q 2006	96% of trouble tickets		Extensive analysis is underway to decrease the frequency of troubles in the first 5 days after order completion. Embarq continues to emphasize completion testing on service orders and is replacing outside plant cables that contribute to trouble tickets. Embarq is also reaching out to CLECs with high levels of troubles to further investigate the issue. Embarq is reviewing internal reporting procedures that may affect the way dispatched tickets are counted on the Embarq side.
A Embarq system erroneously defaults all UNE Loops xDSL order codes to "Other".	1Q 2006	4Q 2006	TBD		A corrective enhancement to the system has been identified and is scheduled to be implemented in 4Q 2006.



Measure 18: Average Completion Notice Interval					
Submeasure 18.01: All Electronic					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Several Embarq systems are reporting longer completion notice intervals than customers actually experience.	2Q2005	2Q 2006 1Q 2006 3Q 2005	80-90% of minutes 10-15% of orders		A system enhancement was implemented in October 2005 to allow Embarq to appropriately report the actual completion notice intervals. Updates to another system are pending. Embarq expects this issue to be resolved in 2Q 2006.

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
Service center representatives are not clearing errors within the objective. Orders are not completed by Embarq's order routing system if they contain a specific indicator. This also prevents downstream systems from sending the orders back in a timely fashion.	4Q2005	2Q 2006	60-70% of orders 30-40% of orders		The appropriate centers are evaluating examples of this situation for corrective action. Enhancements will be made to two systems in January to correct the issue. One system enhancement is pending.

Measure 19: Customer Trouble Report Rate					
Submeasure 19.101: UNE Loops xDSL Provisioned					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Data is being accumulated to identify actionable causes for troubles. A 3-month study indicates that tickets are excluded with a disposition code of CPE a higher percentage of the time for retail troubles (34% average) than CLEC troubles (17% average). Embarq is investigating the difference and impacts.	1Q 2006 4Q 2005	2Q 2006 1Q 2006	20% of trouble tickets		Embarq has completed an equipment replacement project designed to lessen customer troubles. In addition, Embarq is making several improvement measures to mitigate troubles. <ul style="list-style-type: none"> • Load reduction - Continue to replace defective cable in areas with a high trouble rate • Preventive maintenance - Check and repair faulty pairs in plant that can lead to trouble
Tickets from the National Integrated Business System (NIBS) are mostly coded as "other" which does not adequately differentiate the cause of troubles.					Embarq is also reaching out to CLECs with high levels of troubles to further investigate the issue.
An Embarq system erroneously defaults all UNE Loops xDSL order codes to "Other".	1Q 2006	4Q 2006	TBD		A corrective enhancement to the system has been identified and is scheduled to be implemented in 4Q 2006. The enhancement will allow for further refinement of reporting by breaking out the tickets coded as "other" to provide a clearer picture of what was worked on.

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
Technician errors caused the majority of missed commitment times. The process of coordinating testing and vendor meets are causing extended intervals. CLECs occasionally purchase xDSL capable loops and use ISDN equipment. Embarq technicians or contractors working the xDSL loops refer the trouble tickets to technicians with ISDN knowledge. This results in longer intervals for a CLEC that has installed ISDN on an xDSL loop than it does for a Embarq customer that has xDSL equipment on an xDSL loop.	1Q 2006	2Q 2006	60-90% of orders		Embarq is providing refresher training overviews with all Embarq technicians as well as contract companies on CLEC Methods & Procedures to help bring awareness, education and attention to these types of issues. CLEC tickets will be directed to Embarq employees to ensure the highest level of expertise. Embarq is also planning to hire more Embarq technicians. This measure is compliant in March 2006.
An Embarq system erroneously defaults all UNE Loops xDSL order codes to "Other".	1Q 2006	4Q 2006	TBD		A corrective enhancement to the system has been identified and is scheduled to be implemented in 4Q 2006. The enhancement will allow for further refinement of reporting by breaking out the tickets coded as "other" to provide a clearer picture of what was worked on. This measure is compliant in March 2006.

Measure 21: Average Time to Restore					
Submeasure 21.101.01: UNE Loops xDSL Provisioned - Dispatch					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Embarq technicians or contractors working the xDSL loops refer the trouble tickets to technicians with ISDN knowledge. This results in longer intervals for a CLEC that has installed ISDN on an xDSL loop than it does for a Embarq customer that has xDSL equipment on an xDSL loop.	1Q 2006	2Q 2006	60%		Embarq is providing refresher training overviews with all Embarq technicians as well as contract companies on CLEC Methods & Procedures to help bring awareness, education and attention to these types of issues. CLEC tickets will be directed to Embarq employees to ensure the highest level of expertise. Embarq is also planning to hire more Embarq technicians

Measure 21: Average Time to Restore					
Submeasure 21.101.02: UNE Loops xDSL Provisioned - No Dispatch					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Technician errors caused the majority of missed commitment times. The process of coordinating testing and vendor meets are causing extended intervals. CLECs occasionally purchase xDSL capable loops and use ISDN equipment. Embarq technicians or contractors working the xDSL loops refer the trouble tickets to technicians with ISDN knowledge. This	1Q 2006	2Q 2006	60-90% of orders		Embarq is providing refresher training overviews with all Embarq technicians as well as contract companies on CLEC Methods & Procedures to help bring awareness, education and attention to these types of issues. CLEC tickets will be directed to Embarq employees to ensure the highest level of expertise. Embarq is also planning to hire more Embarq technicians. This issue has been fixed and will be compliant in next months report.



results in longer intervals for a CLEC that has installed ISDN on an xDSL loop than it does for a Embarq customer that has xDSL equipment on an xDSL loop.					
An Embarq system erroneously defaults all UNE Loops xDSL order codes to "Other".	1Q 2006	4Q 2006	TBD		A corrective enhancement to the system has been identified and is scheduled to be implemented in 4Q 2006. The enhancement will allow for further refinement of reporting by breaking out the tickets coded as "other" to provide a clearer picture of what was worked on.

Measure 31: Usage Completeness					
Submeasure 31.04: Facilities/Interconnection					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Embarq uncovered a billing issue with a large FL CLEC/IXC where the appropriate Carrier Identification Codes for Local CLEC traffic (vs. Interconnection) were not being used. Embarq also determined that additional billing account changes are needed to allow traffic to bill appropriately without manual corrections. In addition, a recurring manual edit of usage for another large CLEC was scheduled improperly.	1Q 2006	2Q 2006	TBD	TBD	Embarq is coordinating between billing and the service centers to make the necessary billing account changes. The manual edit of usage has been rescheduled effective for April 2006. The billing account changes were completed prior to April billing and this measure will be compliant for April.