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EMBARQ™

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July 21, 2006

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. is an original and 2 copies of Embarq's July 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 March 2006 through May 2006 as published in the April, May and June 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,

Susan S. Masterton

Enclosures

cc: David Rich  
Jerry Hallenstein  
Tabitha Hunter  
Lisa Harvey

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- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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- OTH \_\_\_\_\_

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## July 2006 Root Cause Analysis Report (reflects May 2006 data published June 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 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. <b>This measure is compliant in May 2006.</b>

Measure 6: Average Jeopardy Notice Interval					
Submeasure 6.01.01: Residential POTS - Assignment					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
CLEC orders appear to have shorter jeopardy notice intervals than ILEC orders. In many situations ILEC customers will request a due date beyond the standard interval, particularly where new construction is performed. In these instances, orders are jeopardized due to lack of facilities which results in a long jeopardy notice intervals. Embarq's CLEC and retail service results do not contain a proportionate number of orders with requested due dates longer than the intervals offered thus the results are skewed.	2Q 2006	4Q 2006			Embarq will propose to exclude due dates requested for customer reasons in our 2006 Performance Measurement Plan filing. If approved, a coding change will be implemented 4Q2006.

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. The Analysis team continues to address the indicator issue with the National CLEC Provisioning Center.
Needless referrals by contractors caused missed due dates.	4Q 2005	1Q 2006	10-20% of orders		Embarq is hiring more full-time technicians to eliminate needless referrals.

**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. The Analysis team continues to address the indicator issue with the National CLEC Provisioning Center.

**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.	4Q2005	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. We expect this measure to be compliant in June 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.

**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 were made to two systems in January to correct the issue and one system enhancement is still pending. In the mean time Embarq has engaged a project team to manually assess the data to ensure that orders are properly categorized.

**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.  Tickets from the National Integrated Business System (NIBS) are mostly coded as "other" which does not adequately differentiate the cause of troubles.	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"> <li>• Load reduction - Continue to replace defective cable in areas with a high trouble rate</li> <li>• Preventive maintenance - Check and repair faulty pairs in plant that can lead to trouble</li> </ul> Embarq has identified CLECs with high levels of troubles and is working with account management to discuss issues with the CLECs.
An Embarq system erroneously defaults all UNE Loops	1Q 2006	4Q 2006	TBD		A corrective enhancement to the system has been identified and is



xDSL order codes to "Other".					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.
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**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	3Q 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. The results for this submeasure have steadily improved for the past three months and we expect compliance in the 3 <sup>rd</sup> quarter.

**Measure 23: Frequency of Repeat Troubles in 30-Day Period**

**Submeasure 23.101: 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.	2Q 2006	2Q 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"> <li>• Load reduction - Continue to replace defective cable in areas with a high trouble rate</li> <li>• Preventive maintenance - Check and repair faulty pairs in plant that can lead to trouble</li> </ul> <p>Embarq is also reaching out to CLECs with high levels of troubles to further investigate the issue. <b>This measure is compliant in May 2006.</b></p>
An Embarq system erroneously defaults all UNE Loops xDSL order codes to "Other".	2Q 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. <b>This measure is compliant in May 2006.</b>