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EMBARQ™

September 25, 2006

Embarq Corporation
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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

06 SEP 25 PM 4:33

COMMISSION
CLERK

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RE: Docket No. 000121B-TP

Dear Mrs. Bayó:

- MPP
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- SCL
- OPC
- RCA
- SCR
- SGA
- SEC
- DTH

Enclosed for filing on behalf of Embarq Florida, Inc. is an original and 2 copies of Embarq's September 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 May 2006 through July 2006 as published in the June, July and August 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

ss Susan S. Masterton

Enclosures

cc: David Rich
Jerry Hallenstein
Tabitha Hunter
Lisa Harvey

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Susan S. Masterton
COUNSEL

LAW AND EXTERNAL AFFAIRS- REGULATORY

Voice: (850) 599-1560

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DOCUMENT NUMBER-DAT

08858 SEP 25 06

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 25th day of September, 2006.

Felicia Banks
Florida Public Service Commission
2540 Shumard Oak Blvd
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Time Warner Telecom
233 Bramerton Court
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Susan S. Masterton

Susan S. Masterton
sub
for



September 2006 Root Cause Analysis Report (reflects July 2006 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, 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.

DOCUMENT NUMBER - DATE

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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		3Q 2006	Embarq will propose to exclude due dates requested for customer reasons in our 2006 Performance Measurement Plan filing which will help bring Embarq into compliance. If approved, a coding change will be implemented 4Q2006. This measure is compliant for July 2006.

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
Orders from a certain ordering system are erroneously routing to the NEAC for completion and are creating a backlog. Additionally, the center has an unusually high volume of orders being routed back over the hot printer.	3Q 2006	4Q 2006	60-70% of orders		Investigation is in progress to determine the proper method for these orders to be completed and if the NEAC is really where these orders should be routed. If they should be routing to the ordering center a new process will be created to minimize the number of orders which are routed to the hot printer.

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	1Q 2004	3Q 2006 2Q 2006	40-50% of orders		During implementation of a process to identify UNE Loops behind remote end offices in September 2005, Embarq discovered



extended intervals and double dispatches.		4Q-2005 2Q-2005 1Q-2005 4Q-2004 2Q-2004	20-30% of orders 60-70% of days		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. The Analysis team continues to address the indicator issue with the National CLEC Provisioning Center. Follow up meeting have uncovered some coaching opportunities and incorrect TOS indicators. Additional meetings are scheduled with facilities to review the issue.
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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	3Q 2006 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. The Analysis team continues to address the indicator issue with the National CLEC Provisioning Center. Follow up meeting have uncovered some coaching opportunities and incorrect TOS indicators. Additional meetings are scheduled with facilities to review the issue.

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	4Q 2006 2Q-2006 1Q-2006 4Q-2005 3Q-2005	96% of trouble tickets		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. Meetings have begun to discuss CLEC arbitrage policies that affect Embarq's compliance. Embarq's account management and analysis team are working with affected CLECs to improve understanding and communication of repair issues.

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.	4Q 2005	4Q 2006 2Q 2006	40-50% of orders 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 scheduled for 4Q 2006. In the mean time Embarq has engaged a project team to manually assess the data to ensure that orders are properly categorized.
An Embarq system which is responsible for notifying the CLEC of completion was unavailable for several hours this month.	2Q 2006	3Q 2006 2Q 2006	90% of orders		A Tiger team has been created by Network Services to investigate the outage and prevent a recurrence.

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	3Q 2006	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 This measure is compliant for July 2006.
A disproportionate number of CLEC customers are reporting facilities issues than ILEC customers.	2Q 2006	2Q 2006	80% of trouble tickets	3Q 2006	Embarq has identified CLECs with high levels of troubles and is working with account management to discuss issues with the CLECs. Meetings have begun to discuss CLEC arbitrage policies that affect Embarq's compliance. Embarq's account management and analysis team are working with affected CLECs to improve understanding and communication of repair issues. This measure is compliant for July 2006.
An Embarq system erroneously defaults all UNE Loops xDSL order codes to "other" which does not adequately differentiate the cause of troubles.	1Q 2006	4Q 2006	TBD	3Q 2006	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 for July 2006.

Measure 20: Percent of Customer Trouble Not Resolved Within Estimated Time
Submeasure 20.101.01: UNE Loops xDSL Provisioned - Dispatch

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
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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.	3Q 2006	3Q 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 has converted many contractors to full time employees and are conducting additional training for those employees.
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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 has converted many contractors to full time employees and are conducting additional training for those employees.

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
Embarq experienced issues centered on a Service Order Interface (SOI) server migration that prevented CLEC records from processing to the E911 database within 48 hours.	3Q 2006	4Q 2006	2%	10/2006	Server migration projects will be completed in October 2006.