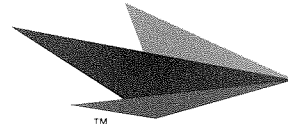


Voice | Data | Internet | Wireless | Entertainment



EMBARQTM

Embarq Corporation
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Tallahassee, FL 32301
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December 20, 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 Embarq's December 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 Embarq, which shall then be published on a monthly basis. This report is for results for the period of August 2006 through October 2006 as published in the September, October and November reports.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Susan S. Masterton
Susan S. Masterton

Enclosures

**cc: David Rich
Jerry Hallenstein
Tabitha Hunter
Lisa Harvey**

Susan S. Masterton
COUNSEL
LAW AND EXTERNAL AFFAIRS- REGULATORY
Voice: (850) 599-1560
Fax: (850) 878-0777

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to all known parties of record this 20th day of December, 2006.

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Susan S. Masterton



December 2006 Root Cause Analysis Report (reflects October 2006 data published November 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, Embark shall provide a report of root cause analysis on a monthly basis. Embark'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 Submeasure 02.03.01: Electronic/Manual Mix – Residential POTS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Assignment of orders in PASS is causing non-compliance for this issue.	4Q 2006	Dec 2006			The PASS system is being modified to change the priority of PONs coming into IRES. Currently there is a large backup of orders falling into the 1 hour prior to FOC miss category. We have found with help from the NEAC center that this category is too late to identify orders, the priority was moved to the category labels 1 to 3 hours prior to FOC due and this is showing preliminary improvement of 30%. This will be implemented in December.

Measure 2: Average FOC Notice Interval Submeasure 02.03.02: Electronic/Manual Mix – Business POTS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Assignment of orders in PASS is causing non-compliance for this issue.	4Q 2006	Dec 2006			The PASS system is being modified to change the priority of PONs coming into IRES. Currently there is a large backup of orders falling into the 1 hour prior to FOC miss category. We have found with help from the NEAC center that this category is too late to identify orders, the priority was moved to the category labels 1 to 3 hours prior to FOC due and this is showing preliminary improvement of 30%. This will be implemented in December.

Measure 2: Average FOC Notice Interval

Submeasure 02.03.101: Electronic/Manual Mix – UNE Loops xDSL Provisioned

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Assignment of orders in PASS is causing non-compliance for this issue.	4Q 2006	Dec 2006			The PASS system is being modified to change the priority of PONs coming into IRES. Currently there is a large backup of



							orders falling into the 1 hour prior to FOC miss category. We have found with help from the NEAC center that this category is too late to identify orders, the priority was moved to the category labels 1 to 3 hours prior to FOC due and this is showing preliminary improvement of 30%. This will be implemented in December.
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Measure 2: Average FOC Notice Interval
Submeasure 02.03.11: Electronic/Manual Mix – UNE Loops Non-Designed

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Assignment of orders in PASS is causing non-compliance for this issue.	4Q 2006	Dec 2006			The PASS system is being modified to change the priority of PONs coming into IRES. Currently there is a large backup of orders falling into the 1 hour prior to FOC miss category. We have found with help from the NEAC center that this category is too late to identify orders, the priority was moved to the category labels 1 to 3 hours prior to FOC due and this is showing preliminary improvement of 30%. This will be implemented in December. <u>This measure is compliant for October data.</u>

Measure 3: Average Reject Notice Interval

Submeasure 03.03.02.01: Electronic/Manual Mix - Content Errors (other edits) - Resale Orders

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Assignment of orders in PASS is causing non-compliance for this issue.	4Q 2006	Dec 2006			The PASS system is being modified to change the priority of PONs coming into IRES. Currently there is a large backup of orders falling into the 1 hour prior to FOC miss category. We have found with help from the NEAC center that this category is too late to identify orders, the priority was moved to the category labels 1 to 3 hours prior to FOC due and this is showing preliminary improvement of 30%. This will be implemented in December.

Measure 3: Average Reject Notice Interval

Submeasure 03.03.02.02: Electronic/Manual Mix - Content Errors (other edits) - UNE Loops and Ports

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Assignment of orders in PASS is causing non-compliance for this issue.	3Q 2006	4Q 2006			The PASS system is being modified to change the priority of PONs coming into IRES. Currently there is a large backup of orders falling into the 1 hour prior to FOC miss category. We have found with help from the NEAC center that this category is



							too late to identify orders, the priority was moved to the category labels 1 to 3 hours prior to FOC due and this is showing preliminary improvement of 30%. This will be implemented in December.
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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	3Q 2006 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. 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. Meetings are ongoing to ensure proper procedures are followed.

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. 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. Meetings are ongoing to ensure proper procedures are followed.

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. Buried drop requests led to non-compliance this month.	2Q 2005	4Q 2006 2Q-2006 1Q-2006	96% of trouble tickets		Embarq is meeting with contractors on a weekly basis to ensure proper procedures are followed. We continue to emphasize completion testing on service orders and are replacing outside



		4Q-2005 3Q-2005			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's account management and analysis team are working with affected CLECs to improve understanding and communication of repair issues.
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Measure 17a: Percentage of Troubles within 5 days for New Orders
Submeasure 17a.11: UNE Loops Non-designed

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Tickets from the National Integrated Business System (NIBS) are mostly coded as "other" which does not adequately differentiate the cause of troubles.	3Q 2006	4Q 2006		06/07	Embarq is waiting on a NIBS system fix project to implement in June. Once the system fix is in place Embarq will be able to provide a better root cause analysis for this submeasure. This month, missing jumpers caused the majority of the non-compliance. Contractor errors were also a factor and contractors will now be trained and coached while working tickets.

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. This measure is compliant for October data.

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
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	1Q 2007 3Q-2006	60%		Embarq is training additional technicians on how to work ISDN orders. Additionally, Embarq plans to implement a new workforce management system in 2007 that will combine several systems into one which will reduce ticket referrals.



Measure 20: Percent of Customer Trouble Not Resolved Within Estimated Time
Submeasure 20.11.01: UNE Loops Non Designed - Dispatch

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Equipment Cards that were either bad or out of adjustment caused extended clearing times because tickets had to be referred from I-R Techs to CO Techs for resolution	4Q 2006				Bad FXS cards were either adjusted or replaced.

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	1Q 2007 3Q 2006 2Q 2006	60%		Embarq is training and coaching additional technicians on how to work ISDN orders. Additionally, Embarq plans to implement a new workforce management system in 2007 that will combine several systems into one which will reduce ticket referrals.

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
CLECs used the wrong function code when sending migrated records. Due to the age of the disconnected Embarq records, Embarq records were modified to allow the CLEC records to update the 911 database.	3Q 2006	4Q 2006	3%	10/2006	Embarq will provide additional training on the procedure to return the record back to the CLEC for proper function code. This measure is compliant for October data.