

**Matilda Sanders**

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**Sent:** Wednesday, June 13, 2007 2:45 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Woods, Vickie; Randa, Johna A; Sims, Nancy H; Holland, Robyn P; Bixler, Micheale; Culpepper, Robert  
**Subject:** 000121A-TP AT&T Florida's information requested by Commission Staff in its Notice of Workshop  
**Attachments:** 000121A-TP comments.pdf

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- A. Lynn Barclay  
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c/o Nancy Sims  
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- B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Incumbent Local Exchange Telecommunications Companies.
- C. AT&T Florida on behalf of Robert A. Culpepper
- D. 12 pages total
- E. AT&T Florida's information requested by Commission Staff in its Notice of workshop dated May 2, 2007.

<<000121A-TP comments.pdf>>

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June 13, 2007

ORIGINAL

Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 000121A-TP**  
**In Re: Investigation into the establishment of operations support systems  
permanent incumbent local exchange Telecommunications companies**

Dear Ms. Cole:

In connection with the workshop scheduled to commence on August 1, 2007, in the above reference docket, please find enclosed the information the Commission Staff requested from AT&T Florida in its notice of workshop dated May 2, 2007

A copy of the same is being provided to all parties as reflected in the attached certificate of service.

Sincerely,

Robert A. Culpepper

Enclosures  
cc: All parties of record  
Jerry D. Hendrix

681255

**CERTIFICATE OF SERVICE**  
**Docket No. 000121A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 13<sup>th</sup> day of June, 2007 to the following:

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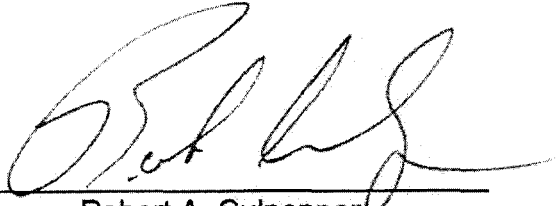
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Robert A. Culpepper

**(+) Signed Protective  
Agreement**

#502166

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into the establishment )  
of operations support systems )  
permanent performance measures for )  
incumbent local exchange )  
telecommunications companies. )  
(BELLSOUTH TRACK) )

Docket No.: 000121A-TP

Filed: June 13, 2007

**COMMENTS AND SUPPORTING DOCUMENTATION OF AT&T FLORIDA**  
**REGARDING CURRENT LEVELS OF FLOW-THROUGH**  
**AND VALID/INVALID CLARIFICATIONS**

As directed by the Staff of the Florida Public Service Commission ("Staff") in its Notice of Meeting/Workshop Hearing dated May 2, 2007, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") hereby submits its comments and supporting documentation regarding certain ordering-related issues raised during the most recent periodic review of AT&T Florida's Performance Assessment Plan (collectively, "SQM/SEEM Plan"). Specifically, AT&T Florida submits herein, as Exhibit "A", Florida aggregate flow-through volumes for each month since October 2006, by product type, planned manual fall-out, and the number of valid and invalid rejects/clarifications.

The current Florida Service Quality Measurement plan ("SQM plan"), dated November 1, 2006, requires that AT&T Florida report monthly flow-through results by four (4) product categories. These product categories are: Residence, Business, UNE-L (includes UNE-L with LNP) and LNP. AT&T Florida reports these results per the metric Percent Flow-Through Service Requests (O-3) on a regional basis as required by the SQM plan. Exhibit "A" contains Florida specific data and, among other things, identifies on a monthly basis: the level of Local

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Service Request (“LSR”) Submissions, Total Manual Fallout (which is planned manual fallout), the number of Validated LSRs, and the actual Percent Flow-Through.

As Staff will recall, in the recent periodic review of the SQM/SEEM Plan, Staff requested data related to the Florida aggregate number of LSRs rejected in error for a six-month period. On September 29, 2006, AT&T Florida (then known as BellSouth) filed with the Commission its response to that request as Action Item No. 8 (b). In its response, AT&T Florida indicated that there was no practical way to count the number of LSRs clarified in error by its service representatives because this would require a manual review of LSRs. Therefore, for purposes of estimating the number of LSRs rejected in error by a service representative, AT&T Florida assumed that for any partially mechanized LSR that was clarified and an associated Firm Order Confirmation (“FOC”) subsequently sent, with no change in the version of the LSR, the LSR was clarified in error. This is the same approach used for this filing and the corresponding estimates are provided in Table 1 below.

<b>TABLE 1 – Florida Results Only</b>				
<b>Month</b>	<b>Total Mechanized LSR Submissions</b>	<b>Total LSRs Clarified</b>	<b>Estimated # of LSRs Clarified in Error By Service Reps.</b>	<b>Estimated % Clarified in Error</b>
Oct-06	84236	10062	260	2.58%
Nov-06	72994	9637	227	2.36%
Dec-06	71265	8925	276	3.09%
Jan-07	91331	10421	260	2.49%
Feb-07	77011	9864	165	1.67%
Mar-07	87255	11739	194	1.65%
Apr-07	84721	11503	158	1.37%
<b>Total</b>	<b>568813</b>	<b>72151</b>	<b>1540</b>	<b>2.13%</b>

In sum, a review of the results provided above shows that for the period October 2006 through April 2007, about 2% of the LSRs were clarified in error by a service representative. Considering that over 568,000 LSRs were submitted electronically during this time frame, the estimated percent clarified in error by a service representative represents only about 0.27% of the total electronic submissions. Given the fact that the vast majority of LSRs are submitted electronically (approximately 95% based on a recent review of Florida data), the data demonstrates that a very small percentage of LSRs are clarified in error by a service representative.

Similarly, the flow-through results shown in Exhibit "A" demonstrate that AT&T Florida consistently meets the benchmark for the specified products as required by the Florida SQM plan. Specifically, the benchmarks for the product categories Residence, Business, UNE-L (includes UNE-L with LNP) and LNP are 95%, 90%, 85%, and 95% respectively. In every month over the 7-month period from October 2006 to April 2007, AT&T Florida exceeded the benchmark for each of these product categories.

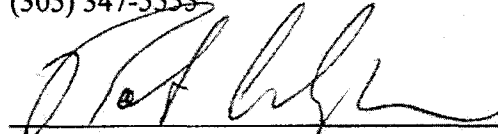


Respectfully submitted this 13<sup>th</sup> day of June, 2007.

*Jim Meza By RAC*

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## RESIDENCE DETAIL AT&T FLORIDA

RESIDENCE ORDER TYPES																
Month	LSR SUBMISSION				LSR PROCESSING									FLOWTHROUGH		
	Mechanized Interface Used				Manual	Rejects		Validated	Errors			Issued SO's	Percent Achieved Flowthrough	Base Calculation	Percent Flow Through	
	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout					
Oct-06	17601	28738	5281	51620	3437	6377	110	41696	794	483	311	40902	91.25%	98.10%	98.83%	
Nov-06	12924	27601	4929	45454	2997	6405	90	35962	1029	687	342	34933	90.46%	97.14%	98.07%	
Dec-06	12697	23396	5027	41120	3162	5442	67	32449	1113	802	311	31336	88.77%	96.57%	97.50%	
Jan-07	19231	29666	6006	54903	3197	6441	114	45151	1646	1070	576	43505	91.07%	96.35%	97.60%	
Feb-07	12308	28903	5701	46912	3785	6755	109	36263	1328	932	396	34935	88.10%	96.34%	97.40%	
Mar-07	13714	34516	6606	54836	3499	8005	105	43227	1644	832	812	41583	90.57%	96.20%	98.04%	
Apr-07	12663	35293	7416	55372	3423	8376	87	43486	1020	486	534	42466	91.57%	97.65%	98.87%	

## BUSINESS DETAIL AT&T FLORIDA

BUSINESS ORDER TYPES																
Month	LSR SUBMISSION				LSR PROCESSING								FLOWTHROUGH			
	Mechanized Interface Used				Manual	Rejects			Validated	Errors			Issued SO's	Percent Achieved Flowthrough	Base Calculation	Percent Flow Through
	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout					
Oct-06	1907	1916	15	3838	574	370	11	2883	205	140	65	2678	78.95%	92.89%	95.03%	
Nov-06	1822	1664	59	3545	722	349	13	2461	244	157	87	2217	71.61%	90.09%	93.39%	
Dec-06	1736	1547	34	3317	463	363	12	2479	255	180	75	2224	77.57%	89.71%	92.51%	
Jan-07	2150	1994	42	4186	565	440	17	3164	251	173	78	2913	79.79%	92.07%	94.39%	
Feb-07	1832	1674	36	3542	738	325	18	2461	187	129	58	2274	72.40%	92.40%	94.63%	
Mar-07	2017	2181	30	4228	789	395	20	3024	186	125	61	2838	75.64%	93.85%	95.78%	
Apr-07	1529	1929	43	3501	522	294	11	2674	186	121	65	2488	79.46%	93.04%	95.36%	

## Total UNE Loops (REQTYP A & B) AT&T FLORIDA

UNE LOOP (REQTYP A & B) ORDER TYPES																
Month	LSR SUBMISSION				LSR PROCESSING								FLOWTHROUGH			
	Mechanized Interface Used				Manual	Rejects			Validated	Errors			Issued SO's	Percent Achieved Flowthrough	Base Calculation	Percent Flow Through
	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout					
Oct-06	814	15306	57	16177	1813	891	128	13345	1372	662	710	11973	82.87%	89.72%	94.76%	
Nov-06	460	11417	44	11921	1704	814	107	9296	957	607	350	8339	78.30%	89.71%	93.21%	
Dec-06	364	14284	52	14700	2772	994	113	10821	1113	691	422	9708	73.71%	89.71%	93.36%	
Jan-07	499	17115	45	17659	2535	940	110	14074	1346	846	500	12728	79.01%	90.44%	93.77%	
Feb-07	384	12554	43	12981	1509	705	100	10667	830	498	332	9837	83.05%	92.22%	95.18%	
Mar-07	318	12895	39	13252	1629	714	114	10795	935	506	429	9860	82.20%	91.34%	95.12%	
Apr-07	357	12160	82	12599	1421	754	94	10330	795	483	312	9535	83.36%	92.30%	95.18%	

## LNP (REQTYP C) AT&T FLORIDA

LNP (REQTYP C) ORDER TYPES															
Month	LSR SUBMISSION				LSR PROCESSING								FLOWTHROUGH		
	Mechanized Interface Used				Manual	Rejects		Validated	Errors			Issued SO's	Percent Achieved Flowthrough	Base Calculation	Percent Flow Through
	LENS	EDI	TAG	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout				
Oct-06	2479	7688	2434	12601	3530	681		8390	749	92	657	7641	67.84%	91.07%	98.81%
Nov-06	2436	6990	2648	12074	3493	672		7909	730	112	618	7179	66.57%	90.77%	98.46%
Dec-06	2368	7021	2739	12128	3507	613		8008	797	92	705	7211	66.71%	90.05%	98.74%
Jan-07	2640	8501	3442	14583	3799	554		10230	1012	120	892	9218	70.17%	90.11%	98.71%
Feb-07	2357	8121	3098	13576	3491	509		9576	913	129	784	8663	70.53%	90.47%	98.53%
Mar-07	2659	9274	3006	14939	4016	584		10339	840	101	739	9499	69.76%	91.88%	98.95%
Apr-07	2562	8234	2453	13249	3613	517		9119	718	67	651	8401	69.54%	92.13%	99.21%