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September 10, 2007

Ms. Ann Cole, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

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COMMISSION
CLERK

RE: Docket 000121A

In re: Investigation into the establishment of operations support systems permanent performance measures for local exchange telecommunications companies

Dear Ms. Cole:

The Competitive Carriers of the South, Inc. ("CompSouth"), is pleased to provide information in response to an action item regarding a CCP/CMP task force raised during the August 1, 2007 Staff Workshop in the above-referenced matter.

Specifically, the parties discussed initiating a CCP/CMP task force to address multiple and invalid clarifications, and CLECs agreed to collect examples and participate in calls/meetings to improve the process. Accordingly, CompSouth provides the following information:

- Following AT&T's recent dramatic OSS changes, CompSouth members are having difficulty getting Type 5 CLEC-requested changes accepted or implemented. Type-2 Mandated changes are more likely to be accepted and implemented.
- In its August 24, 2007 Response to Staff's action item No. 1 regarding processes to detect invalid clarifications, AT&T states that it maintains electronic log of actions taken on a CLEC's LSR by an individual SR, including invalid clarifications reported by the CLEC, and that the LSC management team "reviews periodic reports at an individual SR level, as well as at a larger collective SR team level." Invalid clarifications are the cause of additional expense to CLECs as well as AT&T. In the interest of reducing invalid clarifications and the attendant expenses, CompSouth believes that the periodic reports referenced in AT&T's Response should be filed in this docket (with confidential information, if any, redacted) so that they may be reviewed by Staff and CLECs.

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FPSC-COMMISSION CLERK

Page 2

September 10, 2007

- In its August 24, 2007 Response to Staff's action item No. 2, AT&T states that it does not analyze CLEC-caused fatal rejects and clarifications. As recently as last year, however, AT&T provided a "report card" of errors caused by both AT&T and CLECs. AT&T should be required to reinstitute the report card, which was helpful to CLECs in that it assisted in identification and correction of error-causing processes.
- Because orders with invalid clarifications are moved out of the service queue, invalid clarifications not only prevent CLECs from providing timely service to their customers (because most invalid clarifications result in a loss of the desired due date) but also may improve AT&T's timing metrics. As shown by AT&T's Response to Item No. 14, AT&T is not likely to work toward improving invalid clarifications unless it is required to do so. Accordingly, CLECs request establishment of a diagnostic metric to address multiple and invalid clarifications.

Thank you for your assistance in this matter. Please date stamp the enclosed additional copy of this letter as "filed" and return the same to my office. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Marsha Rule". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Marsha E. Rule

MER/tc

cc:

Mr. Jerry Hallenstein

Ms. Lisa Harvey

Mr. Robert Culpepper, AT&T