



**EMBARQ™**

Embarq  
Mailstop: FTLLH00102  
1313 Blair Stone Rd  
Tallahassee, FL 32301  
embarq.com

February 26, 2008

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

RE: Docket No. 000121B-TP

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. is Embarq's February 2008 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 October 2007 through December 2007 as published in the November, December and January reports.

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

Susan S. Masterton  
SENIOR COUNSEL  
Voice: (850) 599-1560  
Fax: (850) 878-0777  
susan.masterton@embarq.com

**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 26th day of February, 2008.

**Adam Teitzman**  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850  
[ateitzman@psc.state.fl.us](mailto:ateitzman@psc.state.fl.us)

**AT&T (GA)**  
**Sonia Daniels**  
1200 Peachtree St., #400  
Atlanta, GA 30309  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

**Florida Cable Telecommunications**  
**Assoc., Inc.**  
**David A. Konuch**  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
[dkonuch@fcta.com](mailto:dkonuch@fcta.com)

**Pennington Law Firm**  
**Peter Dunbar**  
P.O. Box 10095  
Tallahassee, FL 32301  
[pete@penningtonlawfirm.com](mailto:pete@penningtonlawfirm.com)

**Time Warner Telecom of Florida, L.P.**  
**Ms. Carolyn Marek**  
Time Warner Telecom  
233 Bramerton Court  
Franklin, TN 37069-4002  
[carolyn.marek@twtelecom.com](mailto:carolyn.marek@twtelecom.com)

**AT&T Florida/TCG South Florida,**  
**Inc. (07b)**  
E. Edenfield/T. Hatch  
c/o Mr. Gregory Follensbee  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1561  
[greg.follensbee@att.com](mailto:greg.follensbee@att.com)

**Covad Communications Company**  
Mr. Gregory T. Diamond  
7901 Lowry Blvd.  
Denver, CO 80230-6906  
[gdiamond@covad.com](mailto:gdiamond@covad.com)



**Susan S. Masterton**



# February 2008 Root Cause Analysis Report (reflects December 2007 data published January 2008)

## Florida Public Service Commission

### Background

If there is non-compliance at the aggregate level in three consecutive months for a given level of disaggregation, Embargo shall provide a report of root cause analysis on a monthly basis. Embargo's root cause analysis shall include a plan for corrective action with key activities and anticipated completion dates for implementation.

Measure 01: Average Response Time to Pre-Order Queries					
Submeasure : 01.08.02: Loop Pre-Qualification - All Manual					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Server outages for the SPICE application caused pre-order response times to exceed parameters.	4Q2007	1Q 2008	0	1Q 2008	The fail over servers for the SPICE application are now in place. The move from Dallas to Tulsa is now complete. Interruptions to the network should now be corrected. <b>This is compliant due to a small sample size</b>

Measure 11: Percent of Due Dates Missed					
Submeasure 11.101.01: UNE Loops xDSL Provisioned - Field Work					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
UNE loops behind remote end offices are not identified prior to dispatch, which is causing missed commits. The 18 non-compliant orders, 3 were because Plant Facilities, 12 were because company reasons and 1 for Commercial provided	1Q2008	3Q2008	31%	3Q2008	Order information is sent to OSP supervisors to get TSI information loaded into CLAS to allow orders to flow properly. Embargo is conducting refresher training for technicians using TSI technology on an "as needed" basis. Embargo's staff will develop an M&P for CO technicians for continuing education

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
Of the 11 orders contributing to non-compliance, 2 required CIRAS orders which were completed after the	2Q2007	3Q2008	41%	3Q2008	These issues have been discussed with field management and they will coach as necessary.



due date. On 2 orders field work was not completed until after the due date because first the CLEC provided incorrect information and second the customer had to close the premises while the field work was in progress. On 1 the /Facilities Check was not removed from the order in time to meet the due date. In addition, 2 required field work which was not completed by the due date.						
---	--	--	--	--	--	--

**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
Of the 47 tickets contributing to this non-compliance, 16 or 34% were caused by defective/deteriorated buried cable or acts of nature which impacted buried cable. These tickets do not appear to have a direct link to the service order. Of the 47 tickets, 13 or 28% were due to jumper work on the frame and NID issues.	2Q 2005	1 <sup>st</sup> Q 2008	98%	3Q T2008	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 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.

**Measure 18: Average Completion Notification Interval  
Submeasure 18.03: Electronic-Manual Mix**

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Of the 51 orders contributing to non-compliance, 24 or 47% were due to the R order on the PON closing after the 24 hour limit. For 16 or 31% of the 51 orders the order didn't complete in IRES until after the 24 hour limit. There were 2 or 4% requiring CIRAS orders which didn't close in IRES until after the 24 hour limit.	1QT 2007	1QT2008	28%	1QT2008	The fact that R orders often are the last order on the PON to close and typically close after the due date continue to cause an out of compliant situation on this measure. The ACTC fid project went into production which will affect next month results. The new process will have an email generated either to the EROC or the BROCC depending on the order, if the ACTC is not mechanically successful the first try. Embarq is currently working on the implementation of a new ordering system as well as new internal processes. The new system is expected to shorten cycle time in many areas and improve the CLEC customer experience.