



Robert Culpepper
Senior Attorney

AT&T Florida
150 South Monroe Street
Room 400
Tallahassee, Florida 32301

T: 404-335-0841
F: 404-927-3618
rc1191@att.com
www.att.com

June 2, 2008

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:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Answer to the Complaint filed by Cbeyond Communications, LLC, Time Warner Telecom, LP and DeltaCom, Inc., which we ask that you file in the captioned docket.

A copy of the same is being provided to all parties of record.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix

685327



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 2nd of June, 2008 to the following:

Adam Teitzman
Staff Counsel
Jerry Hallenstein
Lisa Harvey
David Rich
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6175
Fax. No. (850) 413-6250
ateitzma@psc.state.fl.us
jhallens@psc.state.fl.us
lsharvey@psc.state.fl.us
drich@psc.state.fl.us

Tracy W. Hatch
AT&T
100 South Monroe Street
Suite 400
Tallahassee, FL 32301
Tel No. (850) 425-6360
Fax No. (850) 425-6361
thatch@att.com

Kelly A. Fennell (e-mail only)
Director-Crcm
External Affairs-Corp
Michigan Bell Telephone Company
Suite/Floor 1670
444 Michigan Ave
Detroit, MI 48226-2517
Tel No.: (313) 223-0729
Fax No.: (313) 496-9332
Kelly.A.Fennell@att.com

Verizon, Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Tel. No. (813) 483-2617
Fax. No. (813) 223-4888
kimberly.caswell@verizon.com

Peter M. Dunbar, Esquire
Karen M. Camechis, Esquire
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box 10095 (32302)
215 South Monroe Street, 2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
pete@penningtonlawfirm.com

Supra Telecommunications and
Information Systems, Inc.
Marva Johnson
2901 S.W. 149th Avenue
Suite 300
Miramar, FL 33027-4153
Phone: (786) 455-4248
FAX: (786) 455-4600
marva.johnson@supratelecom.com

David Konuch
Senior Counsel
Regulatory Law & Technology
Florida Cable Telecom. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
dkonuch@fcta.com

Douglas C. Nelson
Sprint Nextel
233 Peachtree Street, NE
Suite 2200
Atlanta, GA 30303
Tel. No. 404 649-0003
Fax No. 404 649-0009
douglas.c.nelson@sprint.com

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5493
Fax. No. (770) 284-5488
brian.sulmonetti@wcom.com

William Weber, Senior Counsel
Gene Watkins (+)
Covad Communications
1230 Peachtree Street, N.E.
19th Floor, Promenade II
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (508) 300-7749
wweber@covad.com
gwatkins@covad.com

John Rubino
George S. Ford
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, Florida 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Vicki Gordon Kaufman
Anchors Smith Grimsley
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@asglegal.com
Represents KMC Telecom
Represents Covad
Represents Mpower

Jonathan E. Canis
Kelley Drye & Warren, LLP
1200 19th Street, N.W., Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jcanis@kelleydrye.com

Tad J. (T.J.) Sauder
Manager, ILEC Performance Data
Birch Telecom of the South, Inc.
2300 Main Street FL
Kansas City, MO 64108
Tel. No. (816) 300-3202
Fax. No. (816) 300-3350

John D. McLaughlin, Jr.
KMC Telecom
1755 North Brown Road
Lawrence, Georgia 30043
Tel. No. (678) 985-6262
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335-8349
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474
aisar@millerisar.com

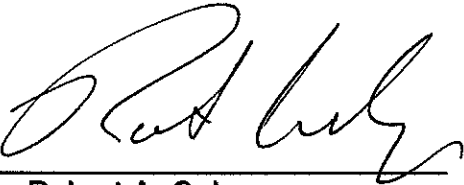
Renee Terry, Esq.
e.spire Communications, Inc.
14405 Laurel Pl.
Suite 200
Laurel, MD 20707-6102
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Suzanne F. Summerlin, Esq.
Attorney At Law
2536 Capital Medical Blvd.
Tallahassee, FL 32308-4424
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589
summerlin@nettally.com
sbharvey@suzannesummerlinattorney.com

Dulaney O'Roark III (+)
WorldCom, Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5498
De.OROark@mci.com

Susan J. Berlin
Nuvox
2 N Main St
Greenville, SC 29601
Tel. No. (864) 331-7323
sberlin@nuvox.com

D. Anthony Mastando
DeltaCom
VP-Regulatory Affairs
Senior Regulatory Counsel
Ste 400
7037 Old Madison Pike
Huntsville, AL 35806
Mary.Conquest@deltacom.com



Robert A. Culpepper

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| | | |
|-------------------------------|---|-----------------------|
| In re: Investigation into the |) | |
| establishment of operations |) | |
| support systems permanent |) | Docket No. 000121A-TP |
| Performance measures for |) | |
| incumbent local exchange |) | |
| telecommunications companies. |) | Filed: June 2, 2008 |
| (BellSouth Track) |) | |
| _____ |) | |

ANSWER OF BELL SOUTH TELECOMMUNICATIONS, INC.
d/b/a AT&T FLORIDA

BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”) hereby responds to the Complaint filed by Cbeyond Communications, LLC (“Cbeyond”), Time Warner Telecom, LP (“Time Warner”) and DeltaCom, Inc. (“Deltacom”) (collectively, “the CLECs”).

PRELIMINARY STATEMENT

Following the merger of BellSouth and AT&T, AT&T commenced on a plan to consolidate the operations support systems (“OSS”) of the two companies. As background, the OSS capability of both companies has undergone exhaustive testing -- including third-party testing -- and has been recognized by regulatory bodies across the nation, including the Federal Communications Commission (“FCC”) in the context of granting in-region long-distance authority to both companies,¹ as providing competitive

¹ See e.g. Memorandum Opinion and Order, *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, FCC 00-238, CC Docket No. 00-65 (June 30, 2000); Memorandum Opinion and Order, *In the Matter of Application of SBC Communications, Inc., Pacific Bell Telephone Company, and Southwestern Bell Communications Services, Inc., for Authorization to Provide In-region, InterLATA Services in California*, FCC 02-330, WC Docket No. 02-306 (Dec. 19, 2002); Memorandum Opinion and Order, *In the Matter of Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Authorization to Provide In-Region, InterLATA Services in Florida and Tennessee*, FCC 02-331, WC Docket No. 02-307 (Dec. 19, 2002).

local exchange carriers (“CLECs”) with nondiscriminatory access to OSS in a manner that satisfies the requirements of the federal Telecommunications Act of 1996.² One benefit of AT&T’s OSS consolidation is the establishment of common interfaces so that CLECs in the Southeast (the 9 legacy BellSouth states) will have access to the same functionality as AT&T’s carrier customers in the 13 legacy SBC states. A common OSS platform ultimately will allow AT&T to provide better, more uniform service to all CLECs.

Approximately one year ago, AT&T started the process of providing official notification to CLECs of its OSS consolidation plans (known as the 22-State OSS Release).³ The 22-State OSS Release plan involves a phased-in approach. The first phase commenced with the April 19, 2008 release (“April Release”). In addition to official notifications, AT&T sent two e-mails to the Change Control Process (“CCP”) distribution list on June 28 and July 5, 2007 that reminded CLECs of the notification process migrating from Carrier Notification Letters to the Accessible Letter process. AT&T presented an overview of the 22-State OSS changes at the CCP/Change Management Procedure (“CMP”) meeting held on September 12, 2007.⁴ Since then, the OSS changes have become a standing agenda item at the monthly CCP/CMP meetings.

AT&T Florida acknowledges that a variety of CLEC-impacting issues arose in connection with the April Release in the Southeast region and that such issues primarily impacted CLECs’ ability to timely receive outbound transmissions⁵ from AT&T in certain situations. AT&T Florida has used, and continues to use best efforts to resolve

² 47 U.S.C. § 271(c)(2)(B)(ii).

³ See Accessible Letter issued on June 1, 2007 (SN9108706).

⁴ CCP and CMP meetings were combined in September 2007.

⁵ Such transmissions, include, but are not limited to: Firm Order Confirmations, Completion Notices, and Billing Completion Notices

such issues, and expects to resolve any known, remaining April Release issues this month. Further, AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner. For example, AT&T OSS Customer Support Teams have contacted numerous CLECs that operate in the Southeast, on both a proactive basis and in response to inquiries, to resolve issues, assist in order processing, and to provide status on previously submitted orders. AT&T has also arranged meetings between CLECs and AT&T subject matter experts (“SMEs”) in order for the SMEs to address manual ordering issues and other OSS-related concerns raised by certain CLECs.

Since the April Release, AT&T has met with the Commission Staff and interested CLECs to discuss the April Release and its plans for future 22-State OSS Releases in the Southeast region. As a result of such meetings, AT&T has made many OSS-related commitments, including a commitment to temporarily suspend future 22-State OSS Releases in the Southeast pending resolution of April Release issues and to expand communications and testing of all future 22-State OSS Releases in the Southeast region. AT&T’s commitments were filed with the Commission on May 27, 2008, and a copy of the same is attached as Exhibit A to this Answer.

Without downplaying the impact of the April Release, AT&T notes that the April Release impacted the Flow Through or mechanized service order creation of approximately 8% or less of CLEC orders. Disruption to the normal processing of Local Service Requests (“LSRs”) was the result of a series of unexpected events including hardware, software, and network issues. There was no total breakdown of AT&T’s OSS. Presently, AT&T’s efforts have substantially resolved the most impacting issues and current processing is mostly “business as usual.” As stated in Exhibit A, the remaining,

known software defects associated with the April Release are expected to be resolved later this month. In sum, it is AT&T's intent to address and resolve the April Release issues and implement process improvements that should reduce, to the furthest extent reasonably possible, the likelihood of issues of this magnitude arising in connection with future 22-State OSS Releases in the Southeast. Moreover, AT&T will keep the Commission Staff and interested CLECs well-informed of its efforts.

In response to the specific allegations set forth in the Complaint, AT&T Florida states as follows. All allegations of the Complaint not expressly admitted are denied.

INTRODUCTION

1. Paragraphs 1, 2 and 3 of the Complaint require no response from AT&T Florida.

STATEMENT OF SUBSTANTIAL INTERESTS

2. Responding to the allegations set forth in Paragraph 4 of the Complaint, AT&T Florida admits only that the CLECs do business in Florida.

3. Responding to the allegations set forth in Paragraph 5 of the Complaint, AT&T Florida admits that the CLECs use AT&T's OSS to place orders, receive firm order confirmations, receive order clarifications, and receive reject notifications.

BACKGROUND

4. Responding to the allegations set forth in Paragraph 6 of the Complaint, AT&T Florida admits that Commission opened this docket (Docket No. 000121-TP), which remains open, and has issued several orders in the docket, including Order No. PSC-01-1819-FOF-TP. AT&T Florida respectfully refers the Commission to the Orders

issued in this docket for their contents, and denies all inconsistent allegations and characterizations.

5. Responding to the allegations set forth in Paragraph 7 of the Complaint, AT&T Florida respectfully refers the Commission to Order No. PSC-01-1819-FOF-TP (and subsequent orders issued in this docket) and § 364.01(3), Florida Statutes for their contents, and denies all inconsistent allegations and characterizations.

6. Responding to the allegations set forth in Paragraph 8 of the Complaint, AT&T Florida admits that a variety of CLEC-impacting issues arose in connection with the April Release in the Southeast region and that such issues primarily impacted CLECs' ability to timely receive outbound transmissions from AT&T in certain situations. AT&T Florida affirmatively avers that it used (and continues to use) best efforts to resolve such issues, and expects to resolve any known, remaining April Release issues this month (see Exhibit A). Further, AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner. Presently, AT&T's efforts have substantially resolved the most impacting issues and current processing is mostly "business as usual."

ALLEGED AT&T OSS FAILURES

7. Responding to the allegations set forth in Paragraph 9 of the Complaint, AT&T Florida admits that the April Release commenced on April 19, 2008.

8. Responding to the allegations set forth in Paragraph 10 of the Complaint, AT&T Florida admits that a variety of CLEC-impacting issues arose in connection with the April Release in the Southeast region and that such issues primarily impacted CLECs' ability to timely receive outbound transmissions from AT&T in certain situations. AT&T

Florida admits that a variety of CLEC-impacting issues arose in AT&T's Southeast region in connection with the April Release. AT&T Florida affirmatively avers that it used (and continues to use) best efforts to resolve such issues, and expects to resolve any known, remaining April Release issues this month (see Exhibit A). Further, AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner. AT&T Florida lacks information and belief to respond to the generalized grievances alleged in Paragraph 10, which are not CLEC-specific, and therefore denies the same. Without limiting the foregoing, AT&T Florida denies that AT&T Florida "took over a week to even begin" to take corrective action in response to the April Release issues, and denies that its call center personal lacked proper training to assist in such corrective action.

9. Responding to the allegations set forth in Paragraph 11 of the Complaint, AT&T Florida admits that a variety of CLEC-impacting issues arose in connection with the April Release in the Southeast region and that such issues primarily impacted CLECs' ability to timely receive outbound transmissions from AT&T in certain situations. AT&T Florida affirmatively avers that it used (and continues to use) best efforts to resolve such issues, and expects to resolve any known, remaining April Release issues this month (see Exhibit A). Further, AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner. Without limiting the foregoing, AT&T Florida admits that an EDI outage occurred on May 5, 2008, but denies that such outage lasted the length of time asserted by the CLECs.

10. Responding to the allegations set forth in Paragraph 12 of the Complaint, AT&T Florida admits that a variety of CLEC-impacting issues arose in connection with

the April Release. AT&T Florida affirmatively avers that it used (and continues to use) best efforts to resolve such issues, and expects to resolve any known, remaining April Release issues this month, including continued proactive and individual support for users of AT&T's manual ordering processes (see Exhibit A). Further, AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner.

11. AT&T Florida lacks information and belief to respond to the generalized grievances alleged in Paragraph 13, which are not CLEC-specific, and therefore denies the same. Without limiting the forgoing, AT&T Florida affirmatively avers that as of close of business on May 24, 2008, AT&T's Birmingham Local Service Center ("LSC") resumed pre-April Release status with the order processing of in-bound requests. Further, AT&T has proactively responded to billing concerns arising out of the April Release and is in the process of proactively issuing billing adjustments in connection with the April Release (see Exhibit A).

12. Responding to the allegations set forth in Paragraph 14 of the Complaint, AT&T Florida admits orders submitted by Cbeyond, Time Warner, DeltaCom, and other CLECs have been impacted by the April Release. AT&T Florida affirmatively avers that it took immediate action in response to the April Release issues, including, but not limited to, providing continuous technical support and expanding the LSC's hours of operation. Currently, the vast majority of all outstanding outgoing transactions (such as FOCs) have been successfully delivered to CLECs.

13. AT&T Florida lacks information and belief to respond to the allegations set forth in Paragraph 15 of the Complaint and therefore denies the same.

14. The allegations set forth in Paragraph 16 of the Complaint are denied. Again, AT&T Florida admits that a variety of CLEC-impacting issues arose in connection with the April Release in the Southeast region and that such issues primarily impacted CLECs' ability to timely receive outbound transmissions from AT&T in certain situations. AT&T Florida affirmatively avers that it used (and continues to use) best efforts to resolve such issues, and expects to resolve any known, remaining April Release issues this month (see Exhibit A). Further, AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner.

15. The allegations set forth in Paragraph 17 of the Complaint are denied.

PMAP AND SEEM IMPACTS

16. Responding to the allegations set forth in Paragraph 18 of the Complaint, AT&T Florida respectfully refers the Commission to the Orders issued in this docket and the current Florida SQM and SEEM plans (collectively, "SQM/SEEM plan") for their contents, and denies all inconsistent allegations and characterizations.⁶ The remaining allegations set forth in Paragraph 18 of the Complaint are denied.

17. To the extent the allegations set forth in Paragraph 19 of the Complaint assert that the SQM/SEEM plan failed to capture certain ordering-related transactions, such allegations are denied. Again, AT&T Florida admits that a variety of CLEC-impacting issues arose in connection with the April Release in the Southeast region and that such issues primarily impacted CLECs' ability to timely receive outbound transmissions from AT&T in certain situations. AT&T Florida affirmatively avers that it used (and continues to use) best efforts to resolve such issues, and expects to resolve any

⁶ The current SQM/SEEM plan can be reviewed at the following web site: <http://pmap.wholesale.att.com/content/documentation.aspx>

known, remaining April Release issues this month (see Exhibit A). Further, AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner. To the extent the April Release caused AT&T Florida to miss the standards associated with ordering-related measures (such as FOC Timeliness or Reject Interval), AT&T Florida will pay applicable SEEM remedy payments.

18. Responding to the allegations set forth in Paragraph 20 of the Complaint, AT&T Florida admits that the OSS Interface Availability measure is not a Tier I measure (it is a Tier II measure). The remaining allegations of Paragraph 20 of the Complaint are denied.

19. The allegations set forth in Paragraph 21 of the Complaint are denied. AT&T Florida respectfully refers the Commission to the SQM/SEEM plan for a description of the FOC Timeliness metric, and denies all inconsistent allegations and characterizations. To the extent the CLECs are requesting additional and/or revised OSS-related SQM/SEEM metrics, AT&T Florida affirmatively avers that such requests should be raised, discussed, and debated in the next periodic review of the SQM/SEEM plan.

20. AT&T Florida lacks information and belief to respond to the generalized grievances alleged in Paragraph 22 of the Complaint, which are not CLEC-specific, and therefore denies the same. To the extent the CLECs are requesting additional and/or revised OSS-related SQM/SEEM metrics, AT&T Florida affirmatively avers that such requests should be raised, discussed, and debated in the next periodic review of the SQM/SEEM plan.

DISPUTED ISSUES OF MATERIAL FACT

21. The allegations set forth in Paragraph 23 of the Complaint are denied. Again, AT&T Florida admits that a variety of CLEC-impacting issues arose in connection with the April Release in the Southeast region and that such issues primarily impacted CLECs' ability to timely receive outbound transmissions from AT&T in certain situations. AT&T Florida affirmatively avers that it used (and continues to use) best efforts to resolve such issues (AT&T expects to resolve any remaining Release issues this month – see Exhibit A) and that AT&T will continue to communicate the status of such issues to all CLECs in a timely and informative manner.

22. Paragraph 24 of the Complaint sets forth a speculative list of potential disputed issues of fact which requires no response from AT&T Florida. To the extent a response is required, the allegations set forth in Paragraph 24 of the Complaint are denied. Without limiting the foregoing, AT&T Florida affirmatively avers that appropriate notice of the April Release was provided in accordance with the Change Management Procedure (“CMP”).

ULTIMATE FACTS ALLEGED

23. The allegations set forth in Paragraph 25 of the Complaint are denied.

STATUTES AND RULES ENTITLING THE CLECs TO RELIEF

24. AT&T Florida respectfully refers the Commission to the cited Florida statutes, Florida administrative rule, and Order No. PSC-01-1819-FOF-TP (as well as the other Orders issued in this docket) for their contents, and denies all inconsistent allegations and characterizations. AT&T Florida denies that the aforementioned authority entitles the CLECs to any relief whatsoever.

RELIEF REQUESTED

25. Responding to the allegations set forth in Paragraph 27 of the Complaint, AT&T Florida respectfully refers the Commission to Order No. PSC-01-1819-FOF-TP (as well as the other Orders issued in this docket) for their contents, and denies all inconsistent allegations and characterizations. Without limiting the foregoing, the applicable SQM/SEEM audit provisions are set forth in Appendix B of the SQM plan and in Section 4.9.1 of the SEEM plan.

26. Responding to the allegations set forth in Paragraph 28 of the Complaint, AT&T Florida denies that an independent audit of the April Release is warranted or necessary. Without limiting the foregoing, AT&T Florida has provided, and will continue to provide, information and explanations regarding the April Release, and has fully supported CLEC requests for status, escalation, and assistance. AT&T Florida will continue to respond to CLEC inquiries both through individual customer support and through weekly meetings opened to all CLECs and will continue to do so until all April Release issues are resolved. Moreover, AT&T's internal review and expanded test plan (see Exhibit A), will include any necessary root cause analysis of the April Release issues.

27. Responding to the allegations set forth in Paragraph 29 of the Complaint, AT&T Florida denies that a stay of future 22-State OSS Releases is appropriate or in the best interests of the users of AT&T's OSS. Moreover, because AT&T Florida has committed to temporarily suspending future 22-State OSS Releases in the Southeast region (see Exhibit A), there is no need for the Commission to consider prohibiting future 22-State OSS Releases in the Southeast region.


28. Responding to the allegations set forth in Paragraph 30 of the Complaint, AT&T Florida respectfully refers the Commission to Order No. PSC-01-1819-FOF-TP (as well as the other Orders issued in this docket) for their contents, and denies all inconsistent allegations and characterizations. The remaining allegations of Paragraph 30 of the Complaint are denied.

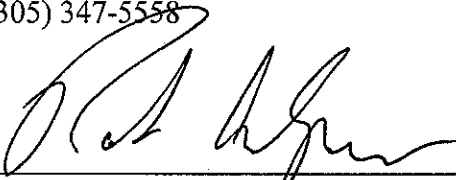
29. Responding to the WHEREFORE section of the Complaint, AT&T Florida denies that the CLECs are entitled to the requested relief.

WHEREFORE, having responded to the Complaint, and given the commitments made by AT&T Florida regarding the April Release and future 22-State OSS Releases in the Southeast region (see Exhibit A), AT&T Florida respectfully requests that the Commission issue an Order dismissing the Complaint and granting such further relief as the Commission deems just and proper.

Respectfully submitted, the 2nd day of June, 2008.

BellSouth Telecommunications, Inc. d/b/a
AT&T FLORIDA


E. EARL EDENFIELD, JR.
TRACY W. HATCH
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558


ROBERT A. CULPEPPER
AT&T Southeast
Suite 4300, AT&T Midtown Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375



Robert Culpepper
General Attorney

AT&T Florida
150 South Monroe Street
Room 400
Tallahassee, Florida 32301

T: 404-335-0841
F: 404-249-4766
rc1191@att.com
www.att.com

May 27, 2008

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:

On May 15, 2008, AT&T participated in two informal meetings with the Commission Staff wherein AT&T discussed issues surrounding the April 2008 22 State OSS Release and AT&T's plans for future 22 State Releases in the SouthEast region. The second meeting included participation by interested competitive local exchange carriers ("CLECs"). During the meetings, AT&T made numerous commitments in connection with future 22 State OSS Releases in the SouthEast region. At Staff's request, AT&T memorialized the commitments made during the May 15th meetings. Accordingly, please find enclosed for filing AT&T's commitments regarding future 22 State Releases in the SouthEast region. The enclosed outline contains both the commitments made by AT&T during the May 15th meetings, as well as some additional commitments AT&T is willing to make in response to certain requests made by the Staff and CLECs. A copy of the same is being provided to all parties of record.

Sincerely,

Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix

712050



**FLORIDA COMMISSION DOCKET NO. 000121A-TP
FOLLOW UP TO MAY 15, 2008 MEETINGS**

As discussed during the meetings held on May 15, 2008, with the Commission Staff and interested competitive local exchange carriers ("CLECs"), AT&T remains committed to resolving the remaining issues associated with the April OSS Release. To address future 22 State Releases in the SouthEast "(SE)" region, AT&T will provide the following:

- I. Temporarily suspend next three planned releases for implementing 22 State Pre-Order and Ordering capabilities into the SE region ("scheduled or future 22 State Releases") until:
 - o Resolve Severity 1 and Severity 2 defects in the SE region resulting from the April 2008 OSS release.
 - o Expand Pre Release, customer training and Post Release communications as outlined below.
 - o Develop an expanded Test Plan to address defect issues resulting from the April Release and include in future release testing.

- II. April Release Defect Resolution
 - o Severity 1 defects identified as of our 5/15/08, with the exception of defect #183638 were fixed by 5/19/08 as committed. Defect #183638 was fixed on 5/21/08.
 - o Fixes for Severity 1 and 2 defects in the SE region resulting from the April 2008 OSS release and in existence as of 5/19/08 will be in production by 6/21/08. If there is any change in this schedule, AT&T will notify Staff and CLECs.
 - o The following status relates to the transmittal of Line Loss Notifications (LLN) and Billing Completion Notices (BCN):
 - LLNs – All outstanding notifications were transmitted successfully on 5/16/08. Normal transmission resumed on 5/17/08.
 - BCNs – Issues with the daily transmission of notifications were resolved on 5/16/08. Transmittal of outstanding notifications began on 5/20/08 using a metered approach; expect completion of the backlog by 6/2/08.

- III. Expanded Communications
 - o Maintain recurring status calls with customers until the earlier of the resolution of Severity 1 and 2 defects resulting from the April OSS release or consensus that calls are no longer necessary.
 - o Continue to status plans for currently scheduled 22 State releases within existing monthly CMP/CCP Meetings. Enhance clarity of pre-release communications by providing a review of all systems and

customer interface changes included in future 22 State releases in advance of Accessible Letter communications. Use this input to improve the clarity of Accessible Letter information.

- Outline CLEC training plans and materials for future 22 State releases. Take into consideration customer input prior to finalization of such training. Release CLEC training materials in accordance with CMP/CCP timeframes.
- In addition to standard communications, Post Release communications for scheduled 22 State releases will be expanded as follows:
 - Recorded messages will be made available during Release Implementation Weekends reporting on current status and “go/no go” readout.
 - A virtual “War Room” will be established during the initial three days after scheduled releases to update customers of any Post Release issues. Daily calls can be expanded/extended as necessary.
- Provide a single document that clearly describes roles/responsibilities/titles for the following AT&T personnel to assist with more effective customer contact and escalation points:
 - Wholesale Customer Support Managers
 - Information Services Call Center
 - Mechanized Customer Production Support Center (MCPSC)
- Perform internal documentation review to enhance clarity of the following communications:
 - Web-based Defect Reporting (EDR Report) – Updated beginning 5/15 and ongoing.
 - XML Documentation – Corrected for identified issue with reject reason field to restore to pre-release length of 5 characters.
 - Systems Outages Notifications
 - Will take into consideration comments received from customers to date and cover results with CLECs once completed.

IV. Expanded Testing/Backout/Failure Management for scheduled 22 State releases

- Utilize root cause analysis of release defects to expand Testing Plans with special focus in the area of delivering outbound transactions. Specific tests will be established for validating that outbound transactions such as FOCs, Clarifications, Completion Notices and

Billing Completion Notices are delivered to their destination point in a form compatible with existing standards and interface agreements.

- Encourage and support greater CLEC participation in cooperative testing for all releases, utilizing existing CLEC test environments.
- Evaluate manual process to determine what steps can be taken to test the process and allow CLECs the opportunity to practice for new forms/templates.
- Going forward, scheduled 22 State releases for the SE region will provide overlap between the existing and new Customer Interfaces (EDI, XML and Verigate/LEX/LENS), in order to allow customers to plan/test/develop individual migration strategies to the new interfaces.
- Testing will include appropriate back out plans for the implementation weekend.
- Prior to next scheduled 22-State release outline post-release action plan to provide expedited response in the event of critical release failures (Emergency Plan), focused on:
 - Customer Notification and Support
 - Defect Resolution
 - Expanded AT&T Staffing requirements

V. Email/Manual Forms Process

Support/Education

- Continue proactive, individualized customer support on Email/Manual Forms process for next 60 days to facilitate user introduction.
 - Including customer working sessions to assist in successful submission of the Manual LSR Forms through use of the email process.
- Lead a monthly Email/Manual Forms User Forum to provide common support and address current manual process issues until all 22 State releases are completed.
- Continue to work with all CLEC customers who request further assistance or education on the manual LSR ordering process.

Review of Manual Processes and CLEC Change Requests

- Assessed CLEC concerns where all pages of a form are required whether or not all pages contain data.
 - The manual ordering process only requires the customer to populate fields necessary for the product being ordered.
 - To address customer concerns regarding the requirement of additional data when submitting forms:
 - Accessible Letter CLECSE08-077 dated 05/21/08 provided additional information within the Manual Ordering

Guidelines and the Frequently Asked Questions (FAQ) documents.

- Will review and assess the prioritized list of customer change requests for enhancements to the 22 State Email LSR Process. In addition, will re-evaluate merger related OSS Change Requests previously submitted through the Change Management process.

Documentation

- Completed updates to the LOH to reflect all changes noticed through Accessible Letter issued as a result of the April 19, 2008 release. Will continue to review to ensure clarity, currency and completeness.
- Proactive review and update of the 22 State Manual LSR Forms and Email Process documentation was done to address customer feedback. Documentation posted to CLEC Website and available 05/21/08:
 - Enhanced 22 State Non-Mechanized Ordering Guide, now renamed as "Manual Ordering Guidelines".
 - Published Frequently Asked Questions (FAQ) document
- Expand documentation quality control processes to ensure multiple layers of review prior to release of documents to the customer.

VI. Proactive Billing adjustments

A call has been scheduled for May 28, 2008 with CLEC customers to discuss the plan for providing generic bill adjustments and addressing billing issues related to the release. Plan entails three key steps: (1) Proactive Billing Adjustments, (2) Claims Clean-up Process for addressing and resolving any exceptions that are not addressed in the Proactive Approach and (3) Communication Plan for the CLECs. Key points regarding the Proactive Billing Adjustments part of the plan include:

- Billing Solution has been developed to identify areas where CLEC billing has been impacted by the Release issues and to proactively provide billing credits, where possible.
 - Proactive billing credits will be triggered by the Billing Completion Notices that are currently being sent in batches starting on 5/20/08.
 - Billing Solution is designed to address the most common CLEC concerns on both NRC and MRC billing resulting from the April Release.
- Target timeline will be to process these proactive adjustments within 45 business days after the sending of the Billing Completion Notice are sent, with a goal to process as many of these proactive adjustments as possible within the first 30 days.

VII. Center /Support Team Responsiveness

- All April Release related calls temporarily handled by other service centers outside of the SE Region, were moved back into the Birmingham LSC by May 19, 2008.
- As of the Close of Business on May 24, 2008, the Birmingham LSC is current with all order processing. Center is now processing orders within standard performance commitments.
- Continue to manage April Release related expedites for the processing of acknowledgements for any individual situations if not addressed by the mechanized transmittal efforts.
- Continue to review staffing levels to meet anticipated demand, including:
 - Wholesale Customer Support Managers
 - Centers