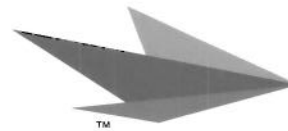


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EMBARQ™

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October 30, 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 October 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 June 2008 through August 2008 as published in the July, August and September reports.

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

Sincerely,

sal
Susan S. Masterton

Enclosures

cc: David Rich
Jerry Hallenstein
Lisa Harvey

Susan S. Masterton
SENIOR COUNSEL
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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 30th day of October 2008.

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ss Susan S. Masterton



October 2008 Root Cause Analysis Report (reflects August 2008 data published September 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, 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
Center did not provision within time limitations	3Q2008			Ongoing Management is working to address ordering issues and exhaust issues to allow for timelier processing of orders.

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
Center did not provision within time limitations.	3Q2008			Ongoing Management is working to address ordering issues and exhaust issues to allow for timelier processing of orders.

Measure 7: Average Completed Interval Submeasure 07.01.02 : Residential POTS - No Field Work				
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date Improvement Plan
The increase in porting orders and the way in which they are closed out (CLEC has 10 days after DD) is causing non-compliance. The difference between the CLEC result and the Embark result is .18.				This issue is being investigated to see if it is a CLEC training issue or a system/analyst problem which can be corrected with training. Once this is determined proper course of action will be taken. Embark will continue to monitor this measure to ensure parity is maintained.

Measure 7: Average Completed Interval Submeasure 07.101.01 : Residential POTS - UNE Loops xDSL Provisioned - Field Work				
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Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
On an individual level we are in parity. With the exception of three orders. One was delayed because to the /CIRAS COMP fid was never added to the order. One was delayed due to workload and one was initially dispatched to the wrong tech and had to be dispatched again to an ISDN tech.	3Q2008			ongoing	Embarq is conducting continuing education to technicians on UNE's behind remote's techniques. Embarq will continue to monitor this measure to ensure parity is maintained.

Measure 7: Average Completed Interval Submeasure 07.11.01 : Residential POTS - UNE Loops Non-Designed - Field Work					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Of the 7 non-compliant orders, five were delayed due to workload, one was delayed due to provisioning issues, one was delayed because no facilities were available and additional engineering had to be completed.				ongoing	Management is working to address provisioning issues and exhaust issues to allow for timelier processing of orders.

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
Of the five non-compliant orders by 24 hrs or more, three were initially dispatched to the wrong group, two were delayed due to workload. This submeasure is compliant for September data.	7/08			ongoing	The dispatch management has been informed of the importance of dispatching to businesses during the customer's working hours. Additionally, they have been informed of the importance of dispatching to techs with the proper skill set for the order.

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 24 non-compliant orders 24hrs or more, six were missed because the due date was revised back from the	7/08		10%	ongoing	The dispatch management has been informed of the importance of dispatching to businesses during the customer's working hours.



<p>date the order was actually completed. Five were delayed due to workload, three were delayed due to service provisioning and two were delayed due to facility availability.</p>					<p>Additionally, business office management has been notified of the importance of providing correct information on orders and taking action to prevent order errors.</p>
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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
	<p>Of the 19 orders with trouble tickets, 14 were due to either deteriorated or lightning damaged buried cable or missing jumpers on the central office frame.</p>	2Q05			ongoing	<p>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 CLEC's with high levels of troubles to further investigate the issue. Embarq's account management and analysis team are working with affected CLEC's to improve understanding and communication of repair issues.</p>

Measure 17A: Percentage of Troubles within 5 days for New Orders

Submeasure 17A.101: UNE Loops xDSL Provisioned	Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
	<p>Of the four orders with trouble tickets two were due to weather damaged buried cable or the removal of bridge taps.</p> <p>This submeasure is compliant for September data.</p>	3Q08			ongoing	<p>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 CLEC's with high levels of troubles to further investigate the issue. Embarq's account management and analysis team are working with affected CLEC's to improve understanding and communication of repair issues.</p>

Measure 18: Average Completion Notification Interval

Submeasure 18.01: All Electronic	Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan



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<p>Of the 139 orders non-compliant by 24 hrs or more 51 or 37% were due to an R order which was the last to close on the PON. Fifty or 36% were due to missing /CIRAS COMP fids or those fids being added when the order closed instead of when the CIRAS order actually closed.</p>	<p>3Q07</p>			<p>ongoing</p>	<p>The \CIRAS COMP fid is not being added due to an issue which developed with the implementation of a new system which is adversely impacting SOE's ability to populate this fid. IT is working on this issue. The fact that R orders often are the last order on the PON to close and typically close after the due date continues to cause an out of compliant situation on this measure.</p>
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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
<p>Of the 92 orders non-compliant by 24hrs or more 61 or 66% were due to an R order which was the last to close on the PON. Twenty-two or 24% were due to the fact that orders on the PON did not have a closing date posted although one was sent from ARC to IRES.</p>	<p>3Q07</p>			<p>2008</p>	<p>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 issue with closing dates not being received from ARC into IRES is being addressed by IT. Management responsible for clearing errors is coaching associates on error resolution process.</p>

Measure 19: Customer Trouble Report Rate
Submeasure 19.147: ELLS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
<p>21 trouble reports 7 trouble reports were the results of lightning/storm damage, possible the result of hurricane but not coded as such. 6 were the result of defective/damaged equipment (jumper, cards, cable pair, cable connector). All were replaced. 2 were the result of bridge taps, which were removed 2 were the result of crossed cable pair and crossed voltage on cable pair, both repaired. 2 were the results of a third party cable cut, repaired. 1 was the result of an EMBARQ tech disabling the mux. 1 was an unknown issue but the doubler and modules were replaced proactively to prevent further trouble.</p>					<p>None. Storm damage accounted for the majority of issues. All storm damaged has been repaired. All defective/damaged equipment issues have been rectified with replacement equipment</p>