

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
Tallahassee, Florida 32399-0850

In the Matter of

Saturn Telecommunication )  
Services Inc., a Florida )  
Corporation )  
 )  
Complainant, )  
 )  
 )  
v. )  
 )  
BellSouth )  
Telecommunications, Inc., a )  
Florida Corporation, )  
d/b/a AT&T )  
 )  
Respondents )

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**AFFIDAVIT OF RONALD E. CURRY**

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State of Florida   }  
  }ss  
County of Broward                                    }

**BEFORE ME** the undersigned authority personally appeared, RONALD (RON) E. CURRY, who after first being duly sworn deposes and says:

**I. INTRODUCTION**

- 1) My name is Ronald (Ron) E. Curry and the following information is true and correct based upon my personal knowledge. I am over the age of 18 and am making this affidavit under penalties of perjury. My business address is 12399 SW 53rd Street Cooper City, Florida 33330.
- 2) My title is Provisioning and Carrier Relations Manager for Saturn Telecommunication Services, Inc. (d/b/a/ STS Telecom, hereafter “STS”).
- 3) I started my career in the telecommunications industry in 1999 as a Customer Service Technician for Ericsson Mobile Phones, where I assisted end users via inbound calls with Ericsson brand cellular phones.
- 4) I joined IDS Telecom in 2000 as a Customer Service Representative for Local, Long Distance, and International Services and finished my tenure with that company in 2003 as an Agent Support Supervisor.
- 5) I joined STS in 2003 as a Customer Service Specialist for local service orders, change orders, provisioning, repair, and customer care.
- 6) My major duties as Provisioning and Carrier Relations Manager for STS include requesting and/or obtaining access to Local Ordering and building and maintaining relationships on STS’ behalf with other carriers such as Bellsouth, AT&T, Verizon, Embarq, FP & L

Fibernet, Level 3, Paetec, XO Communications, Global Crossing, and Time Warner Telecom.

- 7) I am an active CLEC elected member of Bellsouth/AT & T's CUF (CLEC User Forum) as Chair for the CLEC 22-States Community and an active member of BellSouth/AT&T's CCP/CMP (Change Control Process)/ (Change Management Process) where I serve on the executive steering committee representing STS. I have successfully submitted Change Request (Change and Document Defects) on the behalf of STS, the BellSouth Southeast Region and AT & T 22 States CLEC Community for implementation of a change and or a correction. I have participated in these teams/processes since 2004.

## **II. PURPOSE AND SUMMARY**

- 8) I have utilized the BellSouth OSS Systems for the last nine years.
- 9) These BellSouth systems include; Common Access Front End (CAFÉ), Performance Measurement and Analysis Platform (PMAP), CLEC Service Order Tracking System (CSOTS), and Local Exchange Navigation System (LENS). All of these systems are robust and designed to ensure service orders accuracy and eliminate errors which promotes competition, Moreover the BellSouth OSS systems currently operating in Florida protect the Florida Consumer from service outages, delays in service, and billing errors. The current BellSouth OSS systems allows a CLEC to add, convert new customers, process "Directory Listing", move service from one location to another, combine end user record information, separate end user record information, deny & restore service, port service stand-alone and or with loop, disconnect service and change features, of an existing customer in a prompt and seamless manner so as not to detrimentally affect the customer's perception of service quality.

- 10) The LENS Pre Order edits and/or Level 1 validations on the current OSS are designed to send clean LSRs (Local Service Requests) to BellSouth d/b/a/ AT&T from the CLEC/ALEC.
- 11) On or about May 7, 2007 AT&T notified the CLEC community through their Accessible Letter SN91087078 and Change Management CR 2493 that it intended to change their Operation Support Systems (OSS) from the current systems as were provided for by BellSouth to those Operational Support Systems used by the 13 AT&T state region.
- 12) This change is referred to by AT&T as the 22 State OSS alignment.
- 13) Part of this alignment is the retirement of Local Exchange Navigation System (LENS) and the implementation of Local Service Request Exchange (LEX) for placing mechanized orders and Verigate GUI for pre-ordering functions. The BellSouth OSS System LENS performs both pre-ordering and ordering edits; thus what was previously taken care of in a single OSS platform will now require two separate OSS platforms.
- 14) On or about August 5, 2009, AT&T provided the 22 states CLEC Community an high level functionality overview of the upcoming retirement of LENS and implementation of LEX in the November 2009 Release. One material change and the primary objection to the proposed OSS change is that LEX has a “lack” or “missing” pre-order submission edits and/or 1<sup>st</sup> level validation functionality that is contained in LENS today.
- 15) Pre-order submissions edits/1<sup>st</sup> level validations should be preformed as the CLEC/ALEC enters data into the LSR (Local Service Request), which is the case in LENS.
- 16) However LEX has very few pre-order submissions edits/1<sup>st</sup> level validations which are in marked contrast to LENS. Because of the fewer edits, errors would be far more frequent and it would be significantly more difficult to submit a clean order as compared with the current LENS. This is particular troublesome when customer on the line. In LENS, it is a usual

occurrence to go through the preordering process and give the customer a firm date for service. This is far more unlikely in LEX, which could result in a loss of the customer, erosion of customer confidence, and improper billing.

17) In LENS a CLEC cannot submit an order until it is error free, as the system will reject or clarify an erroneous order before submission.

18) In Contrast, a CLEC can submit an erroneous order in LEX, and will not discover the errors until sometime after submission. Not only will this increase the work and expense to a CLEC, but erodes customer's confidence in the CLEC.

19) The LEX OSS system is a major step backwards from the current LENS OSS platform. .

20) IN LENS, the Firm Order Screen can have numerous pages, depending on the type of order.

The 1<sup>st</sup> page on the Firm Order Screen has at minimum of 26 pre-order edit/1<sup>st</sup> level validations from the 1<sup>st</sup> 10 LSR fields in LENS;

- **Please select an Activity Type. (0600)**
- **Please enter a Due Date.(0603)**
- **Desired Due Date Out is prohibited for this REQ TYP/ACT TYP combination. (0297)**
- **You are not authorized to perform this action on service owned by another CLEC. (0022)**
- **Please select a Service Type. (0601)**
- **Please select an Area. (0607)**
- **Invalid PON format. PON must be between one and sixteen alphanumeric characters or the symbols period (.), comma (,), hyphen (-), and apostrophe (') (0083) Please select a PON. (0602)**
- **Migration Indicator is required. (0456)**
- **Invalid Date Format. (0030)**
- **Migration Indicator is prohibited. (0529)**
- **Telephone number does not match specified state. (0028)**
- **Invalid class of service. (0620)**
- **Invalid Request, Activity, and Service Type Combination. (0291)**
- **Service not eligible for this REQ TYP/ACT TYP combination (0367)**
- **Please enter a valid Telephone Number. (0608)**
- **Please select a Loop Type. (0604)**
- **For Unbundled Network Terminating Wire, TOS must be 1B--. (0558)**
- **For Unbundled Network Terminating Wire, Activity Type must be C. (0559)**
- **This Service Type is prohibited with this Request Type/Loop Type combination. (0605)**
- **The due date must be today or in the future. (0029)**

- **The due date must be less than one year in the future. (6010)**
- **Desired Due Date Out is required for this REQ TYP/ACT TYP combination. (0296)**
- **Desired Due Date Out cannot be earlier than today. (0293)**
- **Desired Due Date Out must be less than 31 calendar days before the requested Desired Due Date. (0552)**
- **PON (XXXXXXXX) entered is a duplicate. Please enter another PON (0116)**

21) LENS has more than 1,000 edits /1<sup>st</sup> level errors messages for Ordering and Per-Ordering via LENS User Guide Appendix D, whereas LEX only has a few.

22) BellSouth can place and confirm orders and dates when their customers are on the telephone line. CLECS are currently able to place such order using LENS; however it is highly unlikely that a CLEC could successfully place an order and receive a firm date that will not be subject to future rejection or clarification utilizing LEX.

23) The switching from LENS to LEX gives AT&T an unfair competitive advantage.


24) AT&T has acknowledged this deficiency in LEX. (See highlighted portion of page 6 which is AT&T's Final Minutes of August 5, 2009 meeting, which is attached hereto as Exhibit "1" to this Affidavit)

FUTHER AFFAINT SAYETH NOT

THE REMAINDER OF THIS PAGE LEFT INTENTIONALLY BLANK. SIGNATURE PAGE TO FOLLOW.

  
RONALD E. CURRY

BEFORE ME, the undersigned authority, on this 2<sup>nd</sup> day of September 2009 personally appeared RONALD E. CURRY, who is personally known to me or produced \_\_\_\_\_ as identification, and who after being first duly sworn deposes and says that he had read the foregoing Affidavit, that the information contained therein is true and correct and based upon his personal knowledge.

  
NOTARY PUBLIC  
Print Name:  
Commission No.:

