

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)

AFFIDAVIT OF CARYN DIAZ

State of Florida }
 } ss
County of Broward }

BEFORE ME the undersigned authority personally appeared, CARYN DIAZ, who after first being duly sworn deposes and says:

I. INTRODUCTION

- 1) My name is Caryn Diaz 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 Executive Assistant - Project Director for Saturn Telecommunication Services, Inc. (d/b/a/ STS Telecom, hereafter "STS").
- 3) I have been employed by STS since December 6, 2004.
- 4) My resume is attached to my affidavit as Exhibit 1, and sets forth my experience in the telecommunications industry.
- 5) My responsibilities as Executive Assistant-Project Director for STS include but are not limited to supervision and implementation of special projects involving other carriers such as.; Bellsouth d/b/a AT & T Florida, AT & T INC, Verizon, Embarq, FP & L Fibernet, XO Communications, and Time Warner Telecom.
- 6) In carrying out my responsibilities with STS, I work very closely with the executive officers of the STS to keep them informed of the progress and/or problems on these special projects. I provide administrative assistance for these projects, and I am in charge of the documentation which includes but are not limited to; making sure the minutes of any meeting are accurate, and that the proper business rules, processes and procedures are in place.

II. PURPOSE AND SUMMARY

- 7) On Friday, August 21, 2009 I joined a working conference call with Ron Curry of STS, Cesar Lugo of STS and others. The purpose of the call was to receive a “hands on” overview of LEX OSS pre order issuance.
- 8) Since STS is in the Southeast region and does not have access to LEX, the overview was made possible via WebEx whereas STS worked with another CLEC/Provider to access LEX and process an order. The intention of the overview was to determine the pre order issuances differences between LEX OSS and LENS OSS. LEX is the system scheduled to replace LENS.
- 9) It was necessary to compare the LEX OSS to the LENS OSS, in order to be prepared to properly service STS’ existing customers and be able to efficiently convert, add and service new customers to STS’ network when AT&T switches from its current LENS OSS platform to LEX OSS platform, which is scheduled to occur in the Fall of 2009.
- 10) Based on my own personal observation, there is no doubt that LEX is substantially less efficient than LENS.
- 11) LENS offers significantly more robust features and edits to provide order accuracy and the timely processing of orders.
- 12) Below is a list of LEX inefficiencies as compared to the current LENS platform that I have concluded from the overview.
 - LEX does not emphasize required fields per order issuance. It only emphasizes those fields which are required on ALL order types. Whereas LENS has pre-order issuance edits which will emphasize those fields required by the business rules for each order type. Without these same pre-edits in LEX, the error rate on orders is expected to greatly

increase. In fact, LEX will actually allow you to submit an order without required information such as the service address. This will return an "order" clarification that will eventually be billed to the CLEC and delay processing.

- While navigating the pre-order issuance screens/tabs in LEX, there is no option to reference the business rules. Not only does LEX fail to guide you through the required fields per order issuance, but it doesn't allow you immediate access to the resources necessary to process a clean order. Whereas LENS has a hyperlink available during the entire pre-order process should the business rules need to be referenced.
- LEX does not offer a drop down selection on fields i.e. TOS/Type of Service field whereas LENS does.
- Whereas LENS offers pre-order issuance edits to prevent order clarifications where at all possible, LEX fails to offer such edits. LEX checks for fatal errors once the order is actually submitted and not prior. This in turn will cause preventable clarifications for which the CLEC will be charged , when a supplement order is resubmitted to correct the errors in the order.
- LEX OSS is not an improvement over LENS OSS, but rather a giant leap backwards. I can see no advantages to the CLEC or its customers though the use of LEX, but conversely numerous disadvantages, the major ones of which are set forth above.

13) Because of the lack of edits in LEX, it would not be possible for a CLEC to process an order through the system in a timely manner without errors. If STS wanted to take an order from an end-user over the phone, as AT&T retail does today, it would be impossible to do so timely and efficiently and expect the customer to wait while the order taker works through the errors back and forth in LEX.

14) Also, if an order is submitted with errors in LEX, the system will rejecting it back to you so the order never reaches an AT&T representative. During this time, you cannot cancel an order and start over so as to correct any errors that have been clarified.

15) This could cause internal provisioning problems. The only option of removing the order from

the pending queue is to delete it at which time you will lose the entire order history. Given the history of AT&T's inability to invoice services without error, it would not be in a CLEC's best interest to delete the history of any order that may be subject to billable charges.

III. CONCLUSION

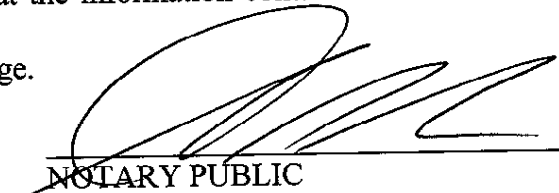
- 16) Overall I can conclude that LEX is a far more inferior ordering system than that of LENS.
- 17) LENS coincides with the business ordering rules to ensure order accuracy. It also provides a practical order flow with edits every step of the way. If at any time while processing an order through LENS there is any question regarding a required field, you can click on the reference library which will open another screen where you can access the business rules directly.
- 18) I am certain that processing orders in LEX will increase order errors, increase charges to the CLEC for supplemental orders as well as delay service to the end user. The use of LEX OSS platform will probably will affect the CLEC's ability to satisfy and thus retain an end user's telecommunication's services after conversion to a CLEC from AT&T or another CLEC.

FUTHER AFFAINT SAYETH NOT.

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


CARYN DIAZ

BEFORE ME, the undersigned authority, on this 2nd day of September 2009 personally appeared CARYN DIAZ, 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.:

