

Marguerite McLean

090430-TP

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Friday, April 16, 2010 11:57 AM
To: Filings@psc.state.fl.us
Subject: 090430-TP AT&T Florida's Letter to Ann Cole re: LEX/LENS Audit Order
Importance: High
Attachments: Untitled.pdf

- A. Vickie Woods
BellSouth Telecommunications, Inc. d/b/a AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560
vf1979@att.com
- B. Re: Docket No. 090430-TP: Petition for verified emergency injunctive relief and request for stay of AT&T's CLEC OSS-related releases by Saturn Telecommunications Services, Inc.
- C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida

on behalf of Tracy W. Hatch
- D. 8 pages total (includes letter, certificate of service and Attachments 1 and 2)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Letter to Ann Cole re: LEX/LENS Audit Order

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4/16/2010

DOCUMENT NUMBER-DATE

02927 APR 16 2010

FPSC-COMMISSION CLERK



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April 16, 2010

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

Re: Docket No. 090430-TP – Amended petition for verified emergency injunctive relief and request to restrict or prohibit AT&T from implementing its CLEC OSS related releases, by Saturn Telecommunications Services, Inc.

Dear Ms. Cole:

Pursuant to Commission order, the Florida Public Service Commission (staff) issued its audit of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Local Service Request Exchange System (LEX) and Local Exchange Navigation System (LENS) on April 5, 2010.

In the staff audit report and subsequently in the staff recommendation issued April 8, 2010, the staff found that AT&T should be allowed to move forward with the retirement of the LENS interface under the following conditions:

1. AT&T should conduct LEX volume testing in the production environment, or otherwise prove that capacity in the production environment is adequate in the Southeast back-end systems;
2. AT&T should perform a root cause analysis on the reason for the poor flow-through results for the LEX interface and take appropriate corrective action;
3. AT&T should update all appropriate CLEC documentation for commingled orders via the LEX interface; and
4. AT&T, STS, and staff should work together to resolve the specific LEX ordering issues raised by STS in the March 1, 2010 matrix.

On April 1, 2010, AT&T Florida provided a response to condition number 1 regarding the ability of AT&T's back-end systems to handle the anticipated volume of orders in a production environment when CLECs fully migrate to LEX.

Attachments 1 and 2 to this letter provide AT&T's response to conditions 2, 3 and 4(partial). Attachment 1 provides a root cause analysis regarding the LEX flow through results, and Attachment 2 provides an update of CLEC documentation for commingled orders via LEX. Additionally, regarding condition number 4, AT&T has already begun working with STS to resolve specific LEX ordering issues in its March 1, 2010 matrix. As shown in attachment 2 in response to condition number 3 above, AT&T believes it has already resolved certain issues in the matrix (e.g., see line # 6, items 42-48 in the STS matrix).

Please contact me or MaryRose Sirianni at (850) 577-5553 if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy W. Hatch" with a stylized flourish at the end.

Tracy W. Hatch

cc: All Parties of Record
Gregory R. Follensbee
E. Earl Edenfield, Jr.
Lisa Harvey

CERTIFICATE OF SERVICE
Docket No. 090430-TP

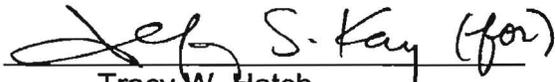
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U.S. Mail this 16th day of April, 2010 to the following:

Timisha Brooks
Staff Counsel
Florida Public Service
Commission
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Tracy W. Hatch

Attachment 1

FPSC Staff Audit – Condition Number 2

2. AT&T should perform a root cause analysis on the reason for the poor flow-through results for the LEX interface and take appropriate corrective action

AT&T continues to see positive trends in Flow Through results for order submitted in LEX. Only one sub measure, LNP, has not met the benchmark in January or February.

O-3 FT Percent Flow through Service Request (Regional Measure)

February Results

Sub measure	Volume	Benchmark	Performance	Equity?
Residence	4,728	>95%	97.34%	YES
Business	1,394	>90%	95.02%	YES
UNE-OTH	129	>85%	89.74%	YES
LNP	2,707	>95%	67.61%	NO

Root Cause

Three CLECs have been submitting LSRs, without populating the required Billing Account Number (BAN) field. These dropped to the Local Service Center (LSC) for manual review. Instead of rejecting the LSRs, the Service Representatives identified the CLEC BAN and issued Service Orders resulting in a miss to this sub measure.

Counter Measures

Service Representatives have been advised to properly reject LSRs that are missing data in required fields, including an unpopulated BAN field. AT&T added a mechanized edit in March 2010 to reject LSRs that are missing data in the BAN field.

Attachment 2

FPSC Staff Audit – Condition Number 3 and 4 (partial)

3. AT&T should update all appropriate CLEC documentation for commingled orders via the LEX interface.
4. AT&T, STS, and staff should work together to resolve the specific LEX ordering issues raised by STS in the March 1, 2010 matrix.

Line #	Documentation Category	Documents /Products Revised	Expected/ Actual Date of Posted Revision	Accessible Letter	Expected/Actual Date of Accessible Letter
1	Commingling	<ul style="list-style-type: none"> • Update Unbundled Dedicated Transport - Ordinarily Combined UNE Combinations • Update UNE Loop Multiple Bandwidth Commingling • Update Single Bandwidth Commingling • Insert CLEC Online "What's New" 	4/19/10	(BUSINESS PROCESSES) Revisions to AT&T Southeast Product UNE Guides for Commingled Loop (Documentation Only Change)	4/17/10
2		<ul style="list-style-type: none"> • Add new UNE Guide: "Migrations to Commingled UVL-SL2 Loop with Number Portability" • Add new LSR Example for same Product • Insert CLEC Online "What's New" 	4/15/10	CLECSE10-049 (ORDERING AND PROVISIONING) New UNE Ordering Guide & Update to Southeast Special Handling Document for Migrations to Commingled UVL SL2 Loop with Number Portability	4/15/10

Line #	Documentation Category	Documents/Products Revised	Expected Date of Posted Revision	Accessible Letter	Expected Date of Accessible Letter
3a	Special Handling	<ul style="list-style-type: none"> Update condition for REQTY B, ACT V for Loop with Number Portability when migrating an existing non-complex LWC Line(s) to a commingled UVL SL2 Loop to include the valid NCI codes 	4/15/10	Included in Accessible Letter (Line #2)	Same as Line #2
3b		<ul style="list-style-type: none"> Add REQTY A, ACT C (Designed Loop) for requests to Change Billing Account Number (BAN) on existing CABS account for circuit using single LSR 	4/15/10	CLECSE10-050 (Ordering and Provisioning) Updates to Southeast Special Handling Document: Added Conditions for Change BAN on CABS Account (REQTYTP A), Partial Moves (REQTYTPs E & M), and Revised General Ordering Documents for Same Products	4/15/10
3c		<ul style="list-style-type: none"> Add Resale non-complex & LWC/WLP non-complex for Partial Move requests 		Included in Accessible Letter (Line 3b)	Same as Line #3b
3d	General Ordering	<ul style="list-style-type: none"> Change BAN on CABS Account Partial Moves (REQTYTP E & M) Non-complex (9-State) Insert CLEC Online "What's New" 		Included in Accessible Letter (Line 3b)	Same as Line #3b

Line #	Documentation Category	Documents/Products Revised	Expected Date of Posted Revision	Accessible Letter	Expected Date of Accessible Letter
4	Southeast Interval Guide	<ul style="list-style-type: none"> • Update DSO and DS1 EELs • Update "2-wire Analog Voice Grade Loop Non-Designed (SL1)" (CHC=Y) – remove "Y" from PM column for QTY less than 15 • Update "WLNP" – remove "Y" from PM column for QTY less than 51 & revise "Notes" to clarify application of PM for Wireless Type 1 Complex Services, i.e. QTY 1-50 is not project managed and QTY greater than 50 is project managed. • Add new section "LSRs for Combined Services" • Add Table of Contents • General clean-up of document • Insert CLEC Online "What's New" 	4/14/10	CLECSE10-047 (BUSINESS PROCESSES) Revision to AT&T Southeast Interval Guide (Documentation Only Change)	4/14/10

Line #	Documentation Category	Documents/Products Revised	Expected Date of Posted Revision	Accessible Letter	Expected Date of Accessible Letter
5	LSOR	LSOR VOL II: Update to clarify definition of "Conditional"	4/23/10	To be issued by 4/23/10	4/23/10
6	LSR Examples	LSR Examples: <ul style="list-style-type: none"> • Change disclaimer language on Examples home page • Post new LSR Example: "CLEC Migration to Commingled UVL-SL2 Loop with Number Portability" (Scenario # 6) • Insert CLEC Online "What's New" 	4/15/10	CLECSE10-048 (BUSINESS PROCESSES) Update to AT&T Southeast LSR Examples and Product/LSR Examples Search Tool Website Home Page in CLEC Online - (Documentation Only Change)	4/14/10