

State of Florida



Public Service Commission

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-M-E-M-O-R-A-N-D-U-M-

COMMISSION
CLERK

DATE: November 5, 2010
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Jerry M. Hallenstein, Government Analyst II, Office of Auditing and Performance Analysis
RE: Docket 090430-TL---Verified Emergency Petition For Injunctive Relief and Request For Stay of AT&T's CLEC OSS-Related Releases

A handwritten signature in black ink, appearing to be "J. Hallenstein", written over the "FROM:" line of the memo.

Please file the attached correspondence in Docket No. 090430-TL.

DOCUMENT NUMBER-DATE

09190 NOV-5 09

FPSC-COMMISSION CLERK

COMMISSIONERS:
ART GRAHAM, CHAIRMAN
LISA POLAK EDGAR
NATHAN A. SKOP
RONALD A. BRISÉ

STATE OF FLORIDA



DALE MAILHOT, DIRECTOR
OFFICE OF AUDITING & PERFORMANCE
ANALYSIS
(850) 413-6854

Public Service Commission

November 2, 2010

Mr. Keith Kramer
Executive Vice President
STS Telecom
12399 SW 53 Street, Suite 102
Cooper City, FL 33330

Dear Mr. Kramer:

Pursuant to FPSC Order No. PSC-10-0253-PAA-TP issued on April 26, 2010, in Docket No. 090430-TL, AT&T, STS, and staff are to work together to resolve specific LEX ordering issues that were provided to staff by STS in the form of a matrix. In order to facilitate final resolution of this docket, staff is soliciting written comments from STS regarding the following three remaining open issues. In addition to general comments, staff requests that the following questions be answered as well.

Issue 1: *LEX does not allow STS to use a Loop Type of "Other" for a Commingled DSO SL2 Circuit.*

1. Could STS order a UNE SL2 DSO commingled arrangement prior to implementation of the LEX ordering interface? If so, please explain the process.
2. Can STS currently order a UNE SL2 DSO commingled arrangement via a manual ordering process? If so, please explain the process.
3. If STS cannot order a UNE SL2 DSO commingled arrangement, regardless of mode of entry (LEX or manual), please explain the alternative loop arrangement that STS orders from AT&T in lieu of the UNE SL2 DSO service. Additionally, please explain why STS would consider the UNE SL2 DSO service to be more beneficial than the alternative arrangement.

Issue 2: *The sequence in which the LSR and the End User Forms are processed by CLECs can cause the ACTL and LSO fields on the LSR page to need to be re-populated.*

1. For requisition types A and C, please explain in detail the step-by-step process STS uses in LEX which causes the ACTL and LSO fields to be re-populated on the LSR page.
2. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?

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DOCUMENT NUMBER-201

09190 NOV-5 01

FPSC-COMMISSION CLERK

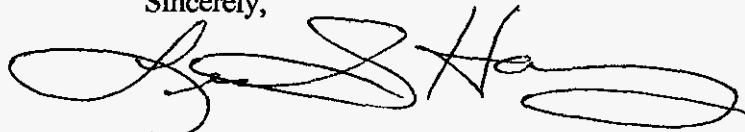
Issue 3: *The R/C/O tables contained within the LOH will not be retained in the same format when converted to the LSOR.*

1. Please explain why a Microsoft Word copy of the R/C/O data is not acceptable to STS.
2. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?

Staff requests that both the general comments and the responses to the questions identified above be filed in FPSC Docket No. 090430-TL by November 17, 2010.

Thank you for the cooperation extended by your company. If you have any questions, please contact Jerry Hallenstein (850) 413-6818.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa S. Harvey', written in a cursive style.

Lisa S. Harvey
Assistant Director

JMH

cc: Dale Mailhot
Jerry Hallenstein
Adam Teitzman
Pauline Evans
Mary Rose Sirianni (AT&T)

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DALE MAILHOT, DIRECTOR
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Public Service Commission

November 2, 2010

Ms. Mary Rose Sirianni
Manager, Regulatory Affairs
AT&T
150 S. Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Dear Ms. Sirianni:

Pursuant to FPSC Order No. PSC-10-0253-PAA-TP issued on April 26, 2010, in Docket No. 090430-TL, AT&T, STS, and staff are to work together to resolve specific LEX ordering issues that were provided to staff by STS in the form of a matrix. In order to facilitate final resolution of this docket, staff is soliciting written comments from AT&T regarding the following three remaining open issues. In addition to general comments, staff requests that the following questions be answered as well.

Issue 1: *LEX does not allow STS to use a Loop Type of "Other" for a Commingled DSO SL2 Circuit.*

1. Is STS allowed to order a UNE SL2 DSO commingled arrangement with a request type "B" through the LEX ordering interface? If not, please explain why.
2. If the answer to question 1 is "no", can STS "manually" order a UNE SL2 DSO commingled arrangement with a request type "B". If so, please provide the step-by-step manual ordering instructions.
3. If the answer to question 1 is "yes", please provide the step-by-step LEX ordering process, and further explain why LEX does not allow for the SPEC and NCI codes.
4. Please provide copies of all Accessible Letters and any additional information provided to CLECs regarding the changes in the ability to order UNE SL2 DSO commingled arrangements through the LEX ordering interface.
5. Please provide copies of any CLEC complaints to AT&T regarding the inability to order UNE SL2 DSO commingled arrangements through the LEX ordering interface.

Issue 2: *The sequence in which the LSR and the End User Forms are processed by CLECs can cause the ACTL and LSO fields on the LSR page to need to be re-populated.*

1. Please provide the specific instructions for ordering requisition types A and C in LEX.
2. Please explain why the ACTL and LSO fields that have to be re-populated on the LSR page would not be considered a defect in the LEX ordering process.
3. Please explain the following statement obtained from AT&T's Final Minutes of the September 15, 2010 Change Management/Change Control Process Meeting: "AT&T agreed that during address validation the ACTL and LSO field are populated with the information from the pre-order system which is what is used by most CLECs."
4. Please provide all Accessible Letters and any additional information provided to LECs regarding the need for re-population of the ACTL and LSO fields for requisition types A and C in LEX.
5. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?
6. Please provide any CLEC complaints to AT&T regarding the need to re-populate the ACTL and LSCO fields in LEX.
7. Please provide any cost-benefit analyses conducted by AT&T regarding this issue.

Issue 3: *The R/C/O tables contained within the LOH will not be retained in the same format when converted to the LSOR.*

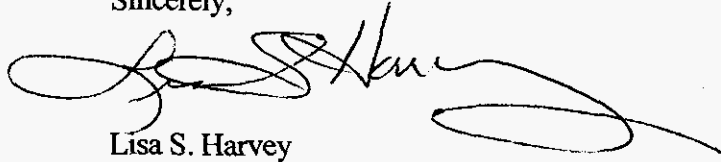
1. AT&T stated that it will offer a one-time file of the existing R/C/O tables in a Microsoft Word format and CLECs can update the document as changes are introduced to the LSOR. Please provide an explanation as to how CLECs will be able to update the Word version of the R/C/O tables.
2. Please provide copies of all accessible letters and any additional information provided to CLECs regarding the retirement of the LOH.
3. Has a change request been issued by AT&T for the retirement of the LOH tables? If not, please explain why.
4. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?
5. Please provide any CLEC complaints to AT&T regarding the need to retain the LOH R/C/O tables.
6. Please provide any cost-benefit analyses conducted by AT&T regarding this issue.

Staff requests that both the general comments and the responses to the questions identified above should be filed in FPSC Docket No. 090430-TL by November 17, 2010.

Mary Rose Sirianni
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November 2, 2010

Thank you for the cooperation extended by your company. If you have any questions, please contact Jerry Hallenstein (850) 413-6818.

Sincerely,

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Lisa S. Harvey
Assistant Director

JMH

cc: Dale Mailhot
Jerry Hallenstein
Adam Teitzman
Pauline Evans
Keith Kramer (STS Telecom)