

**Dorothy Menasco**

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**From:** James Parado [jparado@acgoldlaw.com]  
**Sent:** Friday, December 30, 2011 11:12 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** Alan Gold; th9467@att.com; ms8675@att.com; ateitzman@psc.state.fl.us; Pauline Robinson; Jerry Hallenstein; Lisa Harvey; Ron.Curry@corp.earthlink.com; pfoley@corp.earthlink.com  
**Subject:** Docket 090430 STS Response to the FPSC Data Request  
**Attachments:** STS TELECOM RESPONSE TO PSC'S Dec. 13th 2011 Question 12-30-11.pdf  
December 30, 2011

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

**Re: Docket No. 0904380-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:

Attached is STS's Response to the December 13, 2011 Question of FPSC Staff following up on the December 13, 2011 meeting in the above-referenced docket.

Copies have been served to the parties shown on the attached certificate of service.

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December 30, 2011

Ms. Ann Cole  
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2540 Shumard Oak Boulevard  
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Re: ~~Docket No. 0904380-TP~~ <sup>- DM</sup> **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:

Attached is STS's Response to the December 13, 2011 Question of FPSC Staff following up on the December 13, 2011 meeting in the above-referenced docket.

Copies have been served to the parties shown on the attached certificate of service.

Sincerely,

/s/Alan C. Gold

Alan C. Gold

CC: All Parties of Record

/Attachment

**CERTIFICATE OF SERVICE**  
**Docket No. 090430-TP**

I HEREBY CERTIFY that a true and correct copy of STS's Response to the December 13, 2011 Question of FPSC Staff following up on the December 13, 2011 was served via electronic mail this 30<sup>th</sup> day of December 2011, to the following:

Adam Teitzman (ateitzman@psc.state.fl.us)  
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/s/Alan C. Gold  
ALAN C. GOLD

**STS'S RESPONSE TO THE DECEMBER 13, 2011 QUESTION OF FPSC STAFF  
FOLLOWING UP ON THE DECEMBER 13, 2011**

**1. Please provide an explanation or copy of any plans to integrate STS with other CLECs under the EarthLink umbrella.**

Although with respect to IXC and special access services, EarthLink has integrated much of STS's CLEC network into the Deltacom, Inc. d/b/a EarthLink Business network, STS still maintains and utilizes its own OSS system, as it did prior to the stock sale. It is anticipated that at least through 2012, STS will continue to maintain and utilize its own OSS system. Any further adoption or migration of STS's OSS systems is currently under review. STS has just reached an agreement with AT&T to amend its existing interconnection agreement with AT&T, which should be shortly filed with the Commission. STS still maintains, and is in the process of extending its commercial agreement with AT&T.

In order for STS to be able to efficiently and correctly place orders, it is imperative that the RCO tables be updated and maintained as staff initially recommended in this docket. In the summer of 2009, AT&T advised the CLEC community that it desired to retire its LENS OSS and replace it with LEX in order to have a uniformed OSS system throughout its 22 state region, which would result in tremendous costs savings to AT&T. This Commission in its proposed agency action dated April 26 2010 allowing LENS to be retired clearly found LEX was inferior to LENS, just as staff did in its audit. LEX did not have the on-line editing capabilities which were contained in LENS, and consequently the placing of a clean order through LEX was more difficult and time consuming than placing an order through LENS. This Commission allowed AT&T's LENS OSS to be retired and replaced with LEX, conditioned on AT&T correcting deficiencies in LEX. Many of these deficiencies were corrected through a discussion process involving STS, AT&T and FPSC staff. Instead of striving to make the LEX OSS comparable to LENS OSS and even AT&T's own retail OSS, AT&T decided to eliminate the RCO tables, and instead of placing the ordering information in the same CLEC friendly usable format as it was in the RCO tables, AT&T changed the format rendering it difficult and time consuming to use and placed the ordering information in the LSOR. Without on-line editing capabilities in LEX, a readily accessible and updated table containing the information required to submit orders is more essential than ever. Without updated RCO tables or a user-friendly format in the LSOR, for certain orders, STS is forced to expend more time on orders, be less effective in placing orders, and utilize more skilled employees to place orders than it historically used. In a future without the RCO tables, as new products become available, there will be no readily accessible way to discover how to order these products, which in all probability will unlawfully deprive STS and other CLECs from access to network elements. This Commission allowed AT&T to save substantial expense in retiring LENS provided that the deficiencies in its replacement, LEX were corrected. At that time, STS believed that the Commission would require LEX to be equivalent to AT&T's retail ordering system. Now AT&T does not want to take an important step in this process, claiming the cost is prohibitive. Not only has AT&T failed to substantiate the alleged

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cost, AT&T should not be allowed to continue to save expense to the detriment of the CLECs and competition in the telecommunications industry in Florida.

STS also questions the accuracy of the tables presented by AT&T. STS suspects that once a “fatal or super-fatal error” is received, the order is reworked utilizing the same PON, and a FOC is obtained, there is no longer a record of the error.