

Ruth Nettles

090430-TP

From: Nancy M. Samry [nmsamry@aol.com]
Sent: Wednesday, January 06, 2010 2:52 PM
To: Filings@psc.state.fl.us; Timisha Brooks; ke2722@att.com; mg2708@att.com; vf1979@att.com; th4696@att.com; jparado@acgoldlaw.com
Cc: kkramer@ststelecom.com; mamarant@ststelecom.com
Subject: Docket 09-0430-TP - Saturn Telecommunication Services, Inc. v. AT&T
Attachments: 09-430TP STS Response to ATT's Protective order .pdf

Please see attached that has been electronically filed today with the Florida Public Service Commission. Thank you.

Nancy M. Samry, F.R.P.
 Alan C. Gold, P.A.
 1501 Sunset Drive
 2nd Floor
 Coral Gables, FL 33143
 305-667-0475, ext 4
 305-663-0799, fax
 nmsamry@aol.com

COM _____
 APA _____
 ECR _____
 GCL _____
 RAD _____
 SSC _____
 ADM _____
 OPC _____
 CLK K. Pena

DOCUMENT NUMBER DATE

00132 JAN-06

FPSC-COMMISSION CLERK

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Paralegal:

Nancy M. Samry, F.R.P.
nmsamry@aol.com

January 6, 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: Saturn Telecommunication Services, Inc. v. AT&T Florida

Dear Ms. Cole:

Enclosed is STS' Response In Opposition To AT&T Florida's Motion For A Protective Order, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the Certificate of Service attached to STS' Response.

Very truly yours,

s/ Alan C. Gold

ALAN C. GOLD

CC: All parties of record

DOCUMENT NUMBER DATE

00132 JAN-6 2010

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

SATURN TELECOMMUNICATION
SERVICES INC., a Florida
corporation,

Petitioner,

v.

BELLSOUTH
TELECOMMUNICATIONS, INC., a
Florida corporation,
d/b/a AT&T

Respondent.

Docket No.090430-TP

Filed: January 6, 2010

**STS' RESPONSE IN OPPOSITION TO AT&T FLORIDA'S MOTION FOR A
PROTECTIVE ORDER**

Comes Now, Saturn Telecommunications Services, Inc. ("STS") and files its Response in Opposition to AT&T Florida's ("AT&T" or "BellSouth") Motion for a Protective Order as follows.

1. AT&T's Motion for a Protective Order which seeks to prohibit the taking of the deposition of AT&T's employee, Steven Hancock, is filed in bad faith and designed to prevent STS and this Commission from discovering the truth; namely, that its new OSS system, LEX, is inferior to LENS¹ and to the system utilized by AT&T retail (RNS).²
2. In order to accomplish its purpose, AT&T distorts the meaning of this Commission's Order issued December 2, 2009, Order No. PSC-09-0799-PAA-TP entitled *ORDER AUTHORIZING STAFF AUDIT AND*

¹ LENS (Local Electronic Navigation System) was implemented by BellSouth, and was required by this Commission to provide for the same quality of on-line edits as the AT&T Retail Navigation System.

² AT&T's RNS (Retail Navigation System) is the ordering system that AT&T (Southeast Region) employs to order retail services to end-users.

GRANTING IN PART AND DENYING IN PART AT&T'S PARTIAL MOTION TO DISMISS AND NOTICE OF PROPOSED AGENCY ACTION ORDER DENYING STS' REQUEST FOR INJUNCTIVE RELIEF AND REQUEST TO RESTRICT OR PROHIBIT AT&T FROM IMPLEMENTING ITS CLEC OSS-RELATED RELEASE ("Order").

3. In Section III, *Decision* of the Order, this Commission ruled: "However, this Commission, in its continuing oversight rule of AT&T's operation support system (OSS) and its exclusive authority to prevent anticompetitive behavior amongst telecommunications providers, may at its discretion, require AT&T to stay its November 14, 2009 release in the form requested by STS".
4. In its Order, this Commission found no need to exercise its discretion to prohibit AT&T from implementing its OSS release, but instead "ORDERED that AT&T shall be required to run the existing OSS ordering interface (LENS) in parallel to the LEX interface until completion of our staff's review and a decision by the Commission in this matter."
5. In its Order, this Commission further ordered that once the proposed agency portion of the order becomes final, "this docket shall be remain open pending the outcome of further proceeding including resolution of the remaining requests in STS' amended petition placed in abeyance until our staff brings a recommendation back to this Commission upon completion of the review."

6. In its Order the Commission clearly and distinctly ruled that it would defer ruling on STS' requests in its amended petition to prevent AT&T from retiring LENS, until the staff conducted its audit of AT&T's operating systems. Thus the Commission will hold any final hearing and decision on STS' requests for relief in abeyance until completion of the audit. The docket remains open. Discovery was not stayed. Moreover there is no reason to stay discovery.
7. In its *Consummation Order*, Order No. PSC-09-0850-CO-TP issued December 29, 2009, this Commission ordered that the Order "has become effective and final" and that "this docket shall remain open."
8. STS appreciates the tremendous efforts that staff is undertaking to audit LEX with regards to both LENS and AT&T Retail Navigation System (RNS); however Staff's audit does not preclude STS from conducting its own investigation into the adequacy of LEX and the comparison of LEX to LENS and to AT&T's RNS. STS' investigation will complement the staff's audit; not hinder it. Moreover the taking of discovery such as the deposition of Mr. Hancock who is intimately involved with AT&T's wholesale OSS systems, will allow this docket, which is still open, to come to a quick resolution upon completion of staff's audit.
9. The applicable rules clearly permit discovery including depositions "after commencement of a proceeding" FAC 28-106.206.
10. Discovery has not been stayed, nor is there a pending request to stay discovery.

11. STS originally attempted to investigate the adequacy of AT&T's wholesale OSS systems without formal discovery by conducting tests and conducting training on such systems sponsored by AT&T. To that end STS traveled to Birmingham, Alabama on November 19, 2009. Even though STS was one of only two CLECs to attend the session, AT&T refused to answer STS questions on the new OSS systems on ordering various types of UNEs that STS utilizes in its commingled network. Rather AT&T berated the questioning by STS employees, and insisted that a separate and private demonstration (training session) be provided. (See string of e-mails attached as Exhibit "A")
12. A separate demonstration to be given by Steve Hancock³ to STS was scheduled for December 22, 2009. Staff also requested to attend. (See e-mails attached hereto as Composite Exhibit "B")
13. AT&T unilaterally cancelled the December 22, 2009 demonstration. Obviously AT&T is trying to hide the defects in LEX and scrambling for additional time to attempt to implement a fix. The instant motion by AT&T is just another desperate attempt to buy more time and to obfuscate the truth.
14. STS requires the deposition of Mr. Hancock to prepare its case. More importantly, STS needs to discover the truth about AT&T's wholesale OSS system in order that it can properly conduct its business and adequately service its customers.
15. The Rules of Civil Procedure regarding discovery are applicable in these proceedings and govern the scope of discovery. STS intends to inquire of

³ This is the person STS noticed to be deposed.

Mr. Hancock those matters permitted under the rules; which “are relevant to the subject matter of the pending action” or “reasonably calculated to lead to the discovery of relevant information: See § 1.280 Fla. R. Civ. P. There is no basis whatsoever to limit the deposition other than required by the applicable rules. AT&T’s request to limit the scope of Mr. Hancock’s deposition to less than required under the rules governing these proceedings is without merit.

WHEREFORE, STS requires that this Commission deny AT&T’s Motion for a Protective Order as to Steve Hancock’s deposition, and require AT&T to produce Mr. Hancock for deposition as expeditiously as possible.

s/ Alan C. Gold
Alan C. Gold (Florida Bar No. 304875)
James L. Parado (Florida Bar No. 580910)
Attorney e-mail address:
agold@acgoldlaw.com
jparado@acgoldlaw.com
ALAN C. GOLD, P.A.
1501 Sunset Drive
2nd Floor
Coral Gables, FL 33143
Telephone: (305) 667-0475
Facsimile: (305) 663-0799

CERTIFICATE OF SERVICE
Docket No. 090430-TP

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

via Electronic Mail this 6th day of January 2010 to the following:

Earl E. Edenfield, Esquire
Tracy W. Hatch, Esquire
Manuel A. Gurdian, Esquire
c/o Gregory R. Follensbee
AT&T Southeast Legal Dept.
150 South Monroe Street, Ste. 400
Tallahassee, FL 33130
Tel. No. (305) 347-5561
Facsimile: (305) 577-4491
Email: ke2722@att.com;
mg2708@att.com

Timisha Brooks, Esquire
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
tbrooks@psc.state.fl.us

s/ Alan C. Gold
Alan C. Gold
(Florida Bar No. 304875)

Alan C. Gold

From: Nmsamry@aol.com
Sent: Tuesday, January 05, 2010 4:16 PM
To: agold@acgoldlaw.com
Subject: Fwd:

Nancy M. Samry, F.R.P.
Alan C. Gold, P.A.
1501 Sunset Drive
2nd Floor
Coral Gables, FL 33143
305-667-2908
305-749-8729, fax
nmsamry@aol.com

From: ke2722@att.com
To: agold@acgoldlaw.com
Sent: 12/4/2009 4:45:00 P.M. Central Standard Time
Subj: RE:

Alan,

I hope you had a nice Thanksgiving as well.

In response to your email, which is unfortunately filled with inaccuracies and erroneous conclusions, I have determined the following:

The LEX Training session in Birmingham included CLECs other than STS and was structured to cover the more typical orders CLECs place. Ron Curry asked during the training session about ordering a "STS specific" UNE in a commingled arrangement. The Instructor informed Mr. Curry that a separate demonstration could be arranged to instruct how STS could order UNEs in a commingled arrangement in LEX electronically. The Instructor requested Mr. Curry contact his AT&T Wholesale Service Manager, Steve Hancock, to discuss this functionality. Not surprisingly, Mr. Curry failed to make any effort to contact Mr. Hancock regarding this demonstration but, at my request, Mr. Hancock has again reached out to Mr. Curry to try and schedule this demonstration despite Mr. Curry's apparent lack of interest.

In addition to STS' ability to order UNEs in a comingled arrangement via e-mail, the demonstration AT&T has offered to STS will show how to order a UNE in a commingled arrangement in LEX electronically. It should be noted that "Commingled Services" may include services that are not Unbundled Network Elements (such as Special Access). While

EXHIBIT "A"

1/5/2010

Special Access is ordered from a different platform, AT&T will demonstrate how STS can place the order for the UNE portion of the commingled arrangement using LEX. In the meantime, AT&T stands by its filing and rejects STS' allegation that they were informed otherwise in the training sessions. Interestingly enough, based on our prior conversations about potential paths forward to resolve the concerns raised by STS in the PSC Workshop, this demonstration would appear to give STS what I believe you indicated they want.

Based on our experiences to date, I have grave concerns about Mr. Curry's ability to understand the basic principles of the LEX system and suggest that it might make more sense to have a more seasoned individual that can grasp the system requirements attend the demonstration along with Mr. Curry. I would hate to see STS make an uninformed filing based on the unreliable and unsupportable conclusions of Mr. Curry. However, if you decide to make such a filing notwithstanding the fact that it would lack merit, then we will react accordingly.

I stand ready to try and find a path to resolution, so feel free to contact me if STS feels the same.

Thanks

Kip

From: Alan C. Gold [mailto:agold@acgoldlaw.com]
Sent: Wednesday, December 02, 2009 4:38 PM
To: Edenfield, Kip
Cc: 'Mark Amarant'; 'Keith Kramer'
Subject:

Hi Kip.

Hope you had a good and restful Thanksgiving

We just reviewed the filing AT&T made FPSC staff on November 24, 2009 in response to Staff's Action Item Requests from the November 9th and 10th 2009 SQM Workshop. AT&T's responses to item 3 and item 6 are inaccurate. The only way that commingled services can be

EXHIBIT "A"

1/5/2010

ordered is manually (e-mail) *Commingled* services cannot be currently ordered through either LEX or LENS. STS verified the same during its recent training sessions of LEX in Birmingham. We wanted to point out the inaccuracies in your recent filing in order to give you the opportunity to correct the same. If we do not hear from you by the close of business, Monday December 7, 2009, we will assume that you have no desire to correct the misstatements and act accordingly

On a separate note, I have not heard back from you regarding the SEEM payments for commingling through e-mail (manual process), since it appeared that AT&T wished to remove such from SQM/SEEM.

Please call if you have any questions, or want to discuss this more fully

Thanks

Alan

Alan C. Gold, Esquire

Law Offices of Alan C. Gold, P.A.

1501 Sunset Drive, Second Floor

Coral Gables, Florida 33143

Office: (305)-667-0475

Facsimile: (305)-663-0799

agold@acgoldlaw.com

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EXHIBIT "A"

1/5/2010

Ron Curry

From: Hancock, Steve [sh2819@att.com]
Sent: Thursday, December 03, 2009 8:14 PM
To: Ron Curry
Subject: RE: LEX Commingling/UNE's Demo for SE

Thanks Ron for the quick reply. If you would also let me know the different ordering scenarios that you would want demo'd, that would be helpful (REQTYP/ACTTYP combinations, etc.).

Thanks,

Steve Hancock

From: Ron Curry [mailto:rcurry@ststelecom.com]
Sent: Thursday, December 03, 2009 5:42 PM
To: Hancock, Steve
Subject: RE: LEX Commingling/UNE's Demo for SE

Steve,

Thanks...let me round up our staff and get a date lined up. I will keep you posted.

Thanks



Ronald E. Curry
Provisioning & Carrier Relations Manager
Direct: (954) 449-8330
Fax: (786) 363-0131
rcurry@ststelecom.com

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From: Hancock, Steve [mailto:sh2819@att.com]
Sent: Thursday, December 03, 2009 5:27 PM
To: Ron Curry
Subject: LEX Commingling/UNE's Demo for SE

Ron,

It is my understanding that during the recent classroom pilot training for LEX in B'ham, STS inquired about ordering "STS specific" UNEs in a commingled arrangement. It is my understanding that the Instructor informed you that a separate demonstration could be arranged to demonstrate how these can be ordered in LEX.

Would you look at your calendar for the week of the 14th – 18th and let me know if there is a day that would work for us to do the demo? We can do a virtual meeting like we've done in the past.

I look forward to hearing from you so we can schedule this demonstration. I also left you a VM.

Thanks,

Steve Hancock, PMP
Sr. Quality/M&P/Process Manager
Worldwide Customer Service / Wholesale Customer Care
AT&T Operations, Inc.
600 N. 19th Street, 20th Floor
Birmingham, AL 35203
205.714.0188

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Ron Curry

From: Ron Curry [rcurry@ststelecom.com]
Sent: Thursday, December 10, 2009 9:29 AM
To: 'HANCOCK, STEVE (ATOPS)'; 'Caryn Diaz'
Subject: RE: LEX Commingling/UNE's Demo for SE

Importance: High

Good Morning Steve,

I left you an voicemail message and here is the follow up. **STS will be available for the LEX Commingling/UNE's Demo for SE on December 22, 2009 in the early afternoon EST.** We request a demo on **ALL the LEX Commingling/UNE's in the SE that AT & T has available.**

Caryn Diaz is the Executive Project Manger for the OSS (LEX, LENS, etc). I have a training this morning and will be in and out of my office today.

Thanks



Ronald E. Curry
Provisioning & Carrier Relations Manager
Direct: (954) 449-8330
Fax: (786) 363-0131
rcurry@ststelecom.com

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From: HANCOCK, STEVE (ATOPS) [mailto:sh2819@att.com]
Sent: Wednesday, December 09, 2009 2:18 PM
To: Ron Curry
Subject: FW: LEX Commingling/UNE's Demo for SE

Ron,

Just touching base with you to see if you have a date in mind for next week? With the holidays upon us and vacations, I wanted to see if we can schedule this. Also, if you would provide me scenarios that you would want demo's, that would be helpful.

Thanks,

Steve Harzock

From: Hancock, Steve
Sent: Thursday, December 03, 2009 4:27 PM

To: 'Ron Curry'
Subject: LEX Commingling/UNE's Demo for SE

Ron,

It is my understanding that during the recent classroom pilot training for LEX in B'ham, STS inquired about ordering "STS specific" UNEs in a commingled arrangement. It is my understanding that the Instructor informed you that a separate demonstration could be arranged to demonstrate how these can be ordered in LEX.

Would you look at your calendar for the week of the 14th – 18th and let me know if there is a day that would work for us to do the demo? We can do a virtual meeting like we've done in the past.

I look forward to hearing from you so we can schedule this demonstration. I also left you a VM.

Thanks,

Steve Hancock, PMP
Sr. Quality/M&P/Process Manager
Worldwide Customer Service / Wholesale Customer Care
AT&T Operations, Inc.
600 N. 19th Street, 20th Floor
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205.714.0188

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Ron Curry

From: Jerry Hallenstein [JHallens@PSC.STATE.FL.US]
Sent: Thursday, December 17, 2009 8:29 AM
To: Ron Curry; HANCOCK, STEVE (ATTOPS); SIRIANNI, MARYROSE (ATTSI)
Cc: Caryn Diaz; Lisa Harvey; Alan C. Gold ; Keith Kramer
Subject: RE: LEX Commingling/UNE's Demo for SE

Mary Rose/Steve,

Lisa and I would also like to attend. We'll need help on our end as how to connect via the Live Meeting.

thanks,
Jerry

From: Ron Curry [mailto:rcurry@ststelecom.com]
Sent: Wednesday, December 16, 2009 5:51 PM
To: 'HANCOCK, STEVE (ATTOPS)'
Cc: 'Caryn Diaz'; Lisa Harvey; Jerry Hallenstein; 'Alan C. Gold '; 'Keith Kramer'
Subject: RE: LEX Commingling/UNE's Demo for SE
Importance: High

Good Evening Steve,

Please see attached letter to you from Mr. Kramer concerning the scope of the demo for next Tuesday's meeting.

Please let me know if you have any questions.

Thanks



Ronald E. Curry
Provisioning & Carrier Relations Manager
Direct: (954) 449-8330
Fax: (786) 363-0131
rcurry@ststelecom.com

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From: HANCOCK, STEVE (ATTOPS) [mailto:sh2819@att.com]
Sent: Wednesday, December 16, 2009 12:03 PM
To: Ron Curry
Subject: RE: LEX Commingling/UNE's Demo for SE

Hey Ron,

In order to clarify the scope of next Tuesday's meeting, we are prepared to demo the REQ TYP B, ACT of V, Bulk Migration Commingling UVL – SL2 loop scenario. I will be providing a Live Meeting invite to you and your team. If you will let me know who needs to attend, that would be helpful.

Please let me know if you have any questions.

Thanks,

Steve Hancock

From: Ron Curry [mailto:rcurry@ststelecom.com]
Sent: Wednesday, December 16, 2009 10:51 AM
To: HANCOCK, STEVE (ATTOPS); 'Caryn Diaz'
Subject: RE: LEX Commingling/UNE's Demo for SE

Good Morning Steve,

I got past a note that you were trying to reach me or Caryn. I apologize that we are not available, we on the SEEM Workshop Conference Call in Florida.

Thanks



Ronald E. Curry
Provisioning & Carrier Relations Manager
Direct: (954) 449-8330
Fax: (786) 363-0131
rcurry@ststelecom.com

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Subject: RE: LEX Commingling/UNE's Demo for SE
Importance: High

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Caryn Diaz is the Executive Project Manger for the OSS (LEX, LENS, etc). I have a training this morning and will be in and out of my office today.

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To: Ron Curry
Subject: FW: LEX Commingling/UNE's Demo for SE

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Thanks,

Steve Hancock

From: Hancock, Steve
Sent: Thursday, December 03, 2009 4:27 PM
To: 'Ron Curry'
Subject: LEX Commingling/UNE's Demo for SE

Ron,

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Steve Hancock, PMP
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