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Sent: Thursday, June 02, 2011 1:17 PM
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Subject: Docket No. 090430-TP
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Attached is an electronic filing for the docket referenced below. If you have any questions, please contact Matt Feil at the number below. Thank you.

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Docket Name and Number: 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.

Filed on Behalf of: DeltaCom, Inc. and XO Communications Services, Inc.

Total Number of Pages: 4

Description of Documents: Statement in Support

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June 2, 2011

ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 090430-TP In re: Amended Petition for Verified Emergency Injunctive Relief and Request to Restrict or Prohibit AT&T from Implementing OSS-related Releases, by Saturn Telecommunication Services, Inc.

Statement in Support of Saturn Telecommunication Service

Dear Ms. Cole:

I write on behalf of DeltaCom, Inc. and XO Communications Services, Inc. (collectively the "Joint CLECs") to express support for the positions taken by Saturn Telecommunication Service, Inc. ("Saturn") in this docket and to urge that the Commission require AT&T to maintain certain Operation Support System ("OSS") functionality, specifically the Required/Conditional/Optional ("R/C/O") Tables and the associated ordering instructions provided per product in Section 3, Ordering, of the AT&T Local Ordering Handbook ("LOH"). Joint CLECs are duly certificated competitive local exchange and interexchange carriers with significant operations in the State of Florida.

Joint CLECs routinely use AT&T's Southeast Region OSS to place orders and pre-orders for wholesale services, to receive confirmation, clarification, jeopardy, completion, and reject notices related to such orders. These orders and pre-orders are integral to our companies' business operations and our ability to serve Florida customers in a manner comparable to how AT&T serves its own retail customers. The R/C/O Tables are part of the OSS and describe, in one resource location, the requirements for the population of the information fields for completing local service requests ("LSRs") for UNEs and retail services.

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After the acquisition of BellSouth, AT&T migrated its Southeast Region OSS from LENS to LEX in order to align all 22 states to a single OSS platform.¹ In so doing, Saturn maintained that critical ordering functionality was lost. Joint CLECs agree that prior to the adoption of LEX, AT&T maintained R/C/O Tables and the associated ordering instructions as both a document, used primarily for manual orders, and as part of the LENS Graphical User Interface (“GUI”) in a built-in, menu-driven, linear form for electronic orders. Now, AT&T maintains neither. The new LEX GUI does not display or otherwise indicate all of the fields that are required to complete an LSR before the order is issued. In the absence of this linear, built-in function, CLECs must refer to the literature in the LOH or the Local Service Ordering Requirements (“LSOR”) to determine whether any particular field out of what may be hundreds of fields² in an LSR ordering form is considered by AT&T to be required, conditional or optional. Presently, a CLEC must guess or hunt for the R/C/O status of each of the fields for the 120 or so product types available. Moreover, navigating through the AT&T documentation is cumbersome and inefficient and represents a significant step backwards by AT&T compared to what was available to CLECs before AT&T decided to abolish the R/C/O Tables.

Until recently, AT&T documented R/C/O Table information by product in an easy-to-use format in the body of the LOH, Section 3, Ordering. In November 2009, AT&T began to convert the R/C/O Tables into a “Product Activity Table” that is listed first by volume number, second by forms, and third by fields for all of the possible product types. Under LEX, if a CLEC submits an LSR but fails to populate the required fields, the order will be accepted by AT&T for processing but will then result in a reject. More often, there is a series of rejects and re-submissions for each missing field because the system will not produce a cumulative list of rejects for the missing required fields. This can cause extended provisioning delays for a CLEC’s customer. Under LENS and AT&T’s internal version of the OSS, known as Retail Navigation System or “RNS,” the required fields for a given product type were/are identified on the order form itself, and the system would not accept an order until all required fields were populated. This obviously places Florida CLECs at a competitive disadvantage and adversely affects the quality of telecommunications service to the Florida consumer. The elimination of the RCO Tables and related instructions exacerbates these problems.

The need for current R/C/O Tables, displayed in a usable format, is even more vital when a CLEC places an order for services that the CLEC has not previously ordered, when a CLEC’s less experienced employees are placing orders, when a CLEC places orders in support of any new CLEC product launch, or when AT&T releases modifications to its OSS, including upgrades, updates, releases or any other revisions.

¹ See, e.g., AL# CLECSSES10-038. This Accessible Letter announced the new date of the AT&T Local Exchange Navigation System (LENS) retirement, which commenced on May 5, 2010, and concluded on July 4, 2010.

² For LSOR 10.10 9-State Ordering Requirements 3/19/2011VOL III & VOL IV Fields counts by Forms, see https://clec.att.com/clec_documents/unrestr/hb/Nb/742//9-State%20LSOR%2010.10%2003-19-11%20VOL%20III.pdf Note that most service orders come with three (3) sets of Forms (i.e., LSR, End-User, and the Service Requested).

Due to the importance of these issues, Joint CLECs have been monitoring this docket and add their statement of support for a requirement that AT&T continue to update the R/C/O Tables in the FINAL Release Requirements for all OSS Releases. Joint CLECs are informed that in a Change Management/Control Process Meeting in July 2009, it was reported that the information contained in Section 3 of the LOH, including the R/C/O Tables, was going to be made available to CLECs in the same usable, product-specific format previously maintained.³ To the extent that AT&T makes good on its 2009 offer to do so, AT&T should also provide an index or table of contents to the volume, akin to the document AT&T had provided and updated prior to 2009.⁴

In addition, Joint CLECs do not support AT&T's current process of providing Line Activity ("LNA")⁵ in a separate table in the Local Ordering Handbook apart from all the others.⁶ To illustrate the concern, consider the example where a CLEC places an order for a UNE Analog Non-Designed Loop (i.e., LNA Tables: Reqtyp A, Analog Non-Designed Loop (DS0)). The CLEC must first determine which products/services LNA R/C/O Tables are in the LOH, and then look in two separate locations for ordering information on the same product/service. This manual process is inefficient and time consuming, and AT&T's ordering personnel are not subjected to this practice when placing AT&T's retail orders.

The lack of current R/C/O Tables impacts Joint CLECs production centers by adding time and expense to locate ordering information to submit clear, error-free orders and places an undue burden on CLECs. Alarming, AT&T had indicated there will be no R/C/O Tables in the future.⁷ AT&T states that it is "integrating" Section 3 of the LOH with the 9-state LSOR as part of R/C/O Table conversion to the 9-state LSOR Product Activity Tables & existing Product documentation. AT&T's action effectively nullifies the R/C/O Tables, and Joint CLECs cannot support the elimination of this important functionality. Joint CLECs urge that the Commission require that AT&T continue to update the R/C/O Tables in the FINAL Release Requirements for all OSS Releases in a manner that is historically-maintained.

³ July 2009 CMP/CCP Meeting Notes @ page 2 Round Table Discussion. "AT&T also asked the CLECs if they would agree to move section 3 in the LOH into the LSOR document as a standalone volume linked to the other volumes. These changes can be implemented in the November release or prior to the release. An Accessible Letter will be released when this move is completed. *STS Telecom inquired if the formatting of these documents would change. AT&T stated this change would not affect formatting.*" (Emphasis added.)

⁴ In an email from AT&T October 13, 2010, AT&T stated "As discussed in the September 15, 2010 CMP/CCP meeting, a onetime copy of the R/C/O Table within Section 3 of the LOH would be available to any requesting CLEC. The LOH Section 3 from July 2009 is attached. This version is provided because this was the last LOH prior to any data being migrated to the LSOR, which began with the November 17, 2009 release (as provided in Accessible Letter CLECS09-022)."

⁵ LNA identifies the activity involved at the line/loop level for certain products/services.

⁶ CLEC Handbook Local Exchange ordering Guides (LOH) and LSOR (9 State) Documentation
<https://clec.att.com/clec/hb/shell.cfm?section=742&hb=507>

⁷ LOH to CLEC Online Documentation will be integrated with 9-state LSOR as part of R/C/O Table conversion to 9-state LSOR Product Activity Tables & existing Product documentation

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AT&T's failure to update and maintain the critical OSS functionality described above hinders the CLECs' ability to service existing customers and initiate service with new customers. AT&T's removal of the R/C/O Tables and related ordering instructions in Section 3 of the LOH results in a marketplace where AT&T provides itself with significantly better service than is provided to all CLECs.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Matthew J. Feil". The signature is fluid and cursive, with a large initial "M" and a stylized "F".

Matthew J. Feil

cc: Staff and persons of record (by email)

Gunster, Yoakley & Stewart, P.A.
ATTORNEYS AT LAW