

ORIGINAL



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November 22, 2004

Mrs. Blanca S. Bayó, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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RE: Docket No. 000121B-TP

Dear Mrs. Bayó:

Enclosed is an original and 15 copies of Sprint's November 2004 Root Cause Analysis (RCA) report as required by Order Number PSC-03-0176-CO-TP in Docket 000121B-TP. This order required that any failure in three consecutive months to meet any performance for a given level of disaggregation shall require a RCA by Sprint, which shall then be published on a monthly basis. This report is for results for the period of July 2004 through September 2004 as published in the August, September and October reports.

A copy of this letter is enclosed. Please stamp it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Susan S. Masterton

Enclosures

cc: Lisa Harvey
Jerry Hallenstein
David Rich

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail to all known parties of record this 22nd day of November, 2004.

**Felicia Banks
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850**

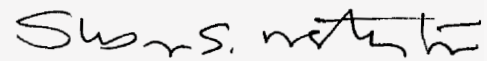
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Susan S. Masterton



November 2004 Root Cause Analysis Report (reflects September 2004 data published October 20)

Florida Public Service Commission

Background

If there is non-compliance at the aggregate level in three consecutive months for a given level of disaggregation, Sprint shall provide a report of root cause analysis on a monthly basis. Sprint's root cause analysis shall include a plan for corrective action with key activities and anticipated completion dates for implementation.

* **Definition of Project Orders:** Service requests that exceed the line size and/or level of complexity that would allow for the use of standard ordering and provisioning processes. Generally, due dates for projects are negotiated, coordination of service installations/changes is required and automated provisioning may not be practical.

Measure 2: Average FOC Notice Interval					
Submeasure 2.01.131: All Electronic – UNE Platform					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint's ordering system processes the manual re-queuing of the order as an electronic order when it should be an electronic/manual mix order. For instance, if an order is received by Sprint's ordering center in error and the analyst corrects the error, the analyst resubmits (original date and time are not impacted) the order so that the system can systematically complete a firm order confirmation notice to the customer.	3Q 2004	1Q 2005 4Q 2004			A system enhancement request was submitted to appropriately include any order manually entered into the queue by an analyst in the electronic/manual mix submeasure. The request is in the level of effort stage; future updates will include the projected improvement dates and estimated impacts.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint's ordering system processes the manual re-queuing of the order as an electronic order when it should be an electronic/manual mix order. For instance, if an order is received by Sprint's ordering center in error and the analyst corrects the error, the analyst resubmits (original date and time are not impacted) the order so that the system can systematically complete a firm order confirmation notice to the customer.	2Q 2004	1Q 2005 4Q 2004	TBD		A system enhancement request was submitted to appropriately include any order manually entered into the queue by an analyst in the electronic/manual mix submeasure. The request is in the level of effort stage; future updates will include the projected improvement dates and estimated impacts.

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Measure 2: Average FOC Notice Interval					
Submeasure 2.03.01: Electronic/Manual Mix – Residential POTS					
Description of Issue	Start	Projected	Estimated Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.	4Q 2003	2Q 2005 3Q 2004	30-40% of orders		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions

Measure 2: Average FOC Notice Interval					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.	2Q 2004	2Q 2005 3Q 2004	30-40% of orders		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday Sprint established a group of dedicated employees to handle complex orders which require manual intervention

Measure 2: Average FOC Notice Interval					
	Date	Improvement	Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.	4Q 2003	2Q 2005 3Q 2004	30-40% of orders		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday Sprint established a group of dedicated employees to handle complex orders which require manual intervention



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Measure 2: Average FOC Notice Interval
Submeasure 2.03.131 Electronic/Manual Mix – UNE Platform

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.	2Q 2004	2Q 2005 3Q 2004	30-40% of orders		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday Sprint established a group of dedicated employees to handle complex orders which require manual intervention

Measure 2: Average FOC Notice Interval
Submeasure 2.03.16: Electronic/Manual Mix – LNP

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Compliance has been impacted due to the complexity and manual intervention required for these types of orders.	3Q 2004	1Q 2005 4Q 2004	30-40% of orders		Sprint has designated specific order assigners to handle these types of orders.

Intent Errors – Resale Orders

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion	3Q 2003	2Q 2005 3Q 2004	30-40% of orders		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday



orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.					<ul style="list-style-type: none"> Sprint established a group of dedicated employees to handle complex orders which require manual intervention
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Submeasure 3.03.02.02: Electronic/Manual Mix – Content Errors – UNE Loops and Ports

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Sprint is experiencing an increase in CLEC project orders which require more manual intervention. Sprint is also experiencing a shift in the types of services ordered from CLEC customers. CLECs are ordering less Resale and more UNE-P and CLEC to CLEC conversion orders. Resale orders can be completed systematically; however, UNE-P and CLEC to CLEC conversion orders must be completed manually.	4Q 2003	2Q 2005 3Q 2004	30-40% of orders		<p>The action plan includes the following:</p> <ul style="list-style-type: none"> Automation of complex orders, such as CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday Sprint established a group of dedicated employees to handle complex orders which require manual intervention

Measure 7: Average Completed Interval

Submeasure 7.01.02: Residential POTS – No Field Work

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Cause analysis is ongoing. One cause that has already been identified as a contributor to shorter ILEC intervals is “no physical work” orders. These orders yield short ILEC intervals.	3Q 2003	4Q 2004 2Q 2004	TBD		<p>The lack of “no physical work” orders for CLEC results is inherent to the business. For example: a “no physical work” order is a ‘change of ownership’ in which a Sprint retail customer calls Sprint and requests a change to the person billed for service (for example, when one roommate transfers the bill to another roommate’s name). If a CLEC customer called a CLEC with the same request, the CLEC would handle this internally and would not submit an order to Sprint on their customer’s behalf.</p> <p>A cross-functional team continues to look for opportunities of reducing CLEC intervals.</p>
High order volumes have caused a backlog of orders in the NEAC. This has resulted in extended intervals due to the manual completion of orders.	3Q 2003	2Q 2005	TBD		<p>The action plan includes the following:</p> <ul style="list-style-type: none"> Automation of complex orders such as, CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday
A Sprint representative failed to follow the process for creating corrective orders which resulted in a 152 interval day order for September.	3Q 2004	3Q 2004	40-50% of days		Order examples were sent to the supervisor for appropriate coaching and corrective action.



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
High order volumes have caused a backlog of orders in the NEAC. This has resulted in extended intervals due to the manual completion of orders.	3Q 2003	2Q 2005	TBD		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders such as, CLEC-to-CLEC conversions Representatives are working overtime Monday through Saturday

Measure 7: Average Completed Interval
Submeasure: 7.101.01: UNE Loops xDSL Provisioned

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.		2Q-2004	20-30% of days 70-80% of days 50-60% of days		Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date. Sprint has implemented several new processes and technologies to enable the use of UNE Loops that are located behind remote end offices. The entire process should be completed by January 1, 2005.
Severe summer storms caused orders to be carried over.	3Q 2004	3Q 2004	60-70% of days 5-10% of days 10-20% of days		This is a seasonal issue that will be resolved as weather conditions improve.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.	2Q 2003	4Q 2004 2Q-2004	40-50% of days 60-70% of days 70-80% of days		Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date. Sprint has implemented several new processes and technologies to enable the use of UNE Loops that are located behind remote end



Severe summer storms caused orders to be carried over.	3Q 2004	3Q 2004	40-50% of days 10-20% of days		This is a seasonal issue that will be resolved as weather conditions improve.
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Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Cause analysis is ongoing. One cause that has already been identified as a contributor to shorter ILEC intervals is "no physical work" orders. These orders yield short ILEC intervals.	3Q 2003	4Q 2004 TBD	TBD		The lacks of "no physical work" orders for CLEC results are inherent to the business. For example: a "no physical work" order is a "change of ownership" in which a Sprint retail customer calls Sprint and requests a change to the person billed for service (for example, when one roommate transfers the bill to another roommate's name). If a CLEC customer called a CLEC with the same request, the CLEC would handle this internally and would not submit an order to Sprint on their customer's behalf. A cross-functional team continues to look for opportunities of reducing CLEC intervals in order to achieve parity with ILEC intervals.
High volumes of complex orders have caused a backlog of orders in the NEAC. This has resulted in extended intervals due to the manual completion of orders.	3Q 2003	2Q 2005	TBD		The action plan includes the following: <ul style="list-style-type: none"> Automation of complex orders such as, CLEC-to-CLEC conversions <p style="text-align: center;">Saturday</p>
A Sprint representative failed to follow the process for creating corrective orders which resulted in a 152 interval day order for September.	3Q 2004	3Q 2004	10-20% of days		Order examples were sent to the supervisor for appropriate coaching and corrective action.

Measure 11: Percent of Due Dates Missed
Submeasure 11.101.01: UNE Loops x-DSL Provision

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.	2Q 2003	4Q 2004 2Q 2004	20-30% of orders 30-40% of orders 20-30% of orders		Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date. Sprint has implemented several new processes and technologies to enable the use of UNE Loops that are located behind remote end offices. The entire process should be completed by January 1, 2005.



Severe summer storms caused orders to be carried over.	2Q 2004	3Q 2004	60-70% of orders 30-40% of orders 40-50% of orders 20-30% of orders		This is a seasonal issue that should be resolved as weather conditions improve.
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Measure 11: Percent of Due Dates Missed

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Certain facilities will not support UNE Loop service. In some cases, this situation cannot be identified until a technician is dispatched on the due date. Additional work may be required in which case the service cannot be provided on the original due date. Sprint does not provide UNE Loops for Sprint retail customers.	2Q 2003	4Q 2004 2Q 2004	30-40% of orders 40-50% of orders 60-70% of orders 30-40% of orders 60-70% of orders		Records are being updated to enable these facilities to be identified earlier in the provisioning process so that all work can be completed by the original due date. Sprint has implemented several new processes and technologies to enable the use of UNE Loops that are located behind remote end offices. The entire process should be completed by January 1, 2005.
Severe summer storms caused orders to be carried over.	3Q 2004	3Q 2004	20-30% of orders		This is a seasonal issue that should be resolved as weather conditions improve.

Measure 17a: Percentage Troubles in 5 Days for New Orders
submeasure 17a.01: Residential POTS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Troubles are being reported on some non-dispatched orders. Non-dispatchable orders automatically flow through provisioning systems and are completed with no indication of any trouble condition until a customer calls. For example there may be a disconnected jumper at the site. In these situations the CLEC will contact Sprint to report a trouble.	4Q 2003	4Q 2004	70-80% of trouble tickets 80-90% of trouble tickets 85-95% of trouble tickets		Non-dispatchable orders meeting certain criteria are being dispatched to ensure service is provided. Data is being accumulated to identify actionable causes for troubles. Corrective actions will be implemented as appropriate. Sprint is also investigating potential ideas for ameliorating the impact of small CLEC volumes in cases where low CLEC ticket volume may decrease the effectiveness of the statistical parity comparisons. Sprint implemented a process to automate ticket submission to technicians via a hand held device. However, some orders were not getting to the Central Office technicians via the hand held device. A routing system was inadvertently closing some orders. The non-worked orders caused Sprint to experience an increase in trouble



					<p>activity. These orders were all sent via printers in the last week of April until the hand held devices could be fixed.</p> <p>Sprint is in the process of identifying wire centers where chronic non-compliance exists. Once a wire center is deemed 'chronic', which includes per 100 and repeats (mostly cleared to outside plant or high level disposition for facilities), Sprint plans to upgrade those facilities.</p> <p>Sprint is also performing refresher training in the districts to improve accuracy of closing troubles related to defective/deteriorated cable.</p> <p>A new defective cable program will be implemented in 2005.</p>
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Measure 18: Average Completion Notice Interval					
Submeasure 18.01: All Electronic					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Technicians are not uploading tasks upon completion within the 20-minute objective.	3Q 2004	4Q 2004	30-40% of orders 40-50% of orders		Technician information was sent to the Administrative Managers for corrective action.
Representative errors caused orders to fail completion on the due date.	3Q 2004	4Q 2004	20-30% of orders 10-20% of orders		Order examples were sent to the appropriate centers for corrective action as well as coaching and counseling.
Representatives failed to re-due date certain orders when the orders were completed after the due date.	3Q 2004	4Q 2004	1-10% of orders 10-20% of orders		Order examples were sent to the appropriate centers for corrective action as well as coaching and counseling.
An ordering system issue occurred in September preventing on time order completion.	3Q 2004	3Q 2004	1-10% of orders	September 2004	The system issue was identified and corrected in September.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Service center workload is shifting to order types which require additional manual intervention. This is preventing the clearing of errors on orders prior to the due date.	3Q 2004	1Q 2005	80-90% of orders 70-80% of orders 80-90% of orders		Several initiatives have been implemented to balance the workload in the service centers. These include streamlining current processes and resource management.



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Measure 19: Customer Trouble Report Rate

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Several issues impacting compliance are related to defective equipment, lightning damage, cable issues, and Sprint employee error.	3Q 2004	1Q 2005	20% of trouble tickets		Equipment and infrastructure maintenance issues continue to be a company-wide priority. It is standard Sprint policy to repair or replace properties identified as sub-standard whenever appropriate. However, many network outages can not be determined until they occur on an individual basis as opposed to an overall network problem. Sprint has been replacing older equipment with new HDSL equipment as a nation-wide initiative. Employee caused errors are addressed through individual coaching and counseling.

Measure 23: Frequency of Repeat Troubles in 30 Day Period

Submeasure 23.101: UNE Loops - xDSL Provisioned

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Clean-up efforts for the numerous hurricanes in Florida this summer required Sprint to supplement its workforce with contractor technicians. These new contracted technicians caused several errors in September since they were unfamiliar with the Sprint system processes. . This increased the amount of technician caused errors in September.	3Q 2004	3Q 2004	TBD	September 2004	Additional training sessions were held with the contractor workforce. Compliance improved as the level of proficiency of the contractors increased. October preliminary results indicated that this issue was resolved.

Measure 32: Recurring Charge Completeness

Submeasure 32.02: UNE

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
A billing system outage and slow response times contributed to the delays in billing.	3Q 2004	1Q 2005	10-15% of orders		Sprint is currently investigating the cause of the system slow response time. Also, a new process has begun which will allow bill processing to be removed from running during business hours to being run at night and on the weekends. This will allow a more efficient system response time.



Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
A billing system outage and slow response times contributed to delays in billing.	3Q 2004	1Q 2005	10-15% of orders		Sprint is currently investigating the cause of the system slow response time. Also, a new process has begun which will allow bill processing to be removed from running during business hours to being run at night and on the weekends. This will allow a more efficient system response time.

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Non-compliance is attributed to failed migrate records. Definition of Migrate Records: A transaction record sent to the E911 database by the recipient company which failed to process because the E911 record is still locked to the previous company.	3Q 2004	TBD	TBD		In a future review of the performance measurement plan, Sprint recommends the elimination or disaggregation of migrate records into a different submeasure. Sprint will be urging the CLECs be more responsive with releasing information to enable Sprint to meet the benchmark.

Measure 44: Center Responsiveness					
Submeasure 44.01: Ordering Center					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Due to increases in 2004 CLEC order volumes and significant manual order intervention, more resources were required to process orders. This resulted in an increase in call answer times.	3Q 2004	4Q 2004	TBD		Sprint has contacted the CLECs with the highest percentage of call volumes to discuss how CLECs can help improve the ordering process. This is expected to decrease the amount of calls coming into the service centers and also decrease the current response time. Analysis indicates that about 35-45% of the calls that come into the center are for information the CLECs are able to view online in IRES. Sprint has also reviewed call processing time and will reallocate resources for efficient call volume management.