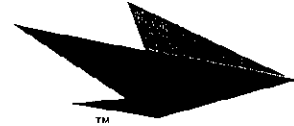


Voice | Data | Internet | Wireless | Entertainment



EMBARQ™

Embarq
Mailstop: FT.LH00102
1313 Blair Stone Rd
Tallahassee, FL 32301
embarq.com

December 28, 2007

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

RE: Docket No. 000121B-TP

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. is Embarq's December 2007 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 Embarq, which shall then be published on a monthly basis. This report is for results for the period of August 2007 through October 2007 as published in the September, October and November reports.

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

Sincerely,

Susan S. Masterton

Enclosures

cc: David Rich
Jerry Hallenstein
Tabitha Hunter
Lisa Harvey

Susan S. Masterton
SENIOR COUNSEL
Voice: (850) 599-1560
Fax: (850) 878-0777
susan.masterton@embarq.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to all known parties of record this 28th day of December, 2007.

Adam Teitzman
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
ateitzman@psc.state.fl.us

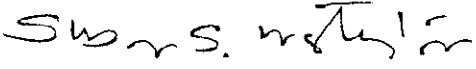
AT&T (GA)
Sonia Daniels
1200 Peachtree St., #400
Atlanta, GA 30309
soniadaniels@att.com

Florida Cable Telecommunications Assoc., Inc.
Beth Keating
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303
beth.keating@akerman.com

AT&T Communications of the Southern States, Inc.
Tracy Hatch/Brian Musslewhite
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
thatch@att.com/bmusslewhite@att.com

Pennington Law Firm
Peter Dunbar
P.O. Box 10095
Tallahassee, FL 32301
pete@penningtonlawfirm.com

Time Warner Telecom of Florida, L.P.
Ms. Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069-4002
carolyn.marek@twtelecom.com



Susan S. Masterton



December 2007 Root Cause Analysis Report (reflects October 2007 data published November 2007)

Florida Public Service Commission

Background

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

Measure 3: Average Reject Notice Interval Submeasure : 03.03.02.01: Electronic/Manual Mix - Content Errors (other edits) - Resale Orders					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
With the decommissioning of UNEP services, CLECs are converting service back to Resale. The increase in Resale orders and an overall PON increase to IRES attributed to this miss.	4Q07	4Q07		1Q08	Embarq is currently working on the implementation of a new ordering system as well as new internal processes. The new system is expected to shorten cycle time in many areas and improve the CLEC customer experience. In the meantime we are working to prioritize and assign orders in the most efficient way. This is compliant for this month.

Measure 7: Average Completed Interval Submeasure 07.02.02 : Res Pots No Field work					
Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Order Volumes due to increase project orders caused delays in follow up for the PDSO report, in turn causing a miss with MRP 7. In addition the increase in porting orders and the way in which they are closed out (CLEC has 10 days after DD). Is also causing non-compliance.	4Q	2Q 2008	25%		Order volumes should decrease in 4Q, also with the installation of EASE, there should be less manual work in the NEAC, which will result in shorter follow up times. This is compliant for this month.



Measure 7: Average Completed Interval Submeasure 07.101.01 : UNE Loops - xDSL Provisioned-Field Work					
	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
3 orders contributed to non-compliance on this measure. One had ARMS issued behind remote, one was due to heavy workload and one was due to a bad pair which was made good on the due date but the customer it would not pass the pair until the day after due date.	8/01/07		62%	12/01/07	Embarq is conducting continuing education to technicians on UNE's behind remote's techniques This is compliant for next month

Measure 11: Percent of Due Dates Missed Submeasure 11.11.01: UNE Loops Non-Designed Field Work					
	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Several due dates were missed largely due to our inability to identify UNE's working behind remotes. All the due dates missed during October were for one customer. Some of the misses occurred where remote devices have not yet been configured with TSI. If there are "unbundled loops" behind NGDLCs and BBDLCs, records behind these must be set up using the TSI.	1Q2007	2Q2008	33%		Embarq is conducting continuing education to technicians on UNE's behind remote's load techniques



Measure 17a: Percentage of Troubles within 5 days for New Orders
Submeasure 17a.01: Residential POTS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Buried cable cuts and damage as well as defective or deteriorated cables led to the number of tickets following orders. The tickets do not appear to have any direct relationship to the orders	2Q 2005	4Q 2007	96% of trouble tickets		Embarq is meeting with contractors on a weekly basis to ensure proper procedures are followed. We continue to emphasize completion testing on service orders and are replacing outside plant cables that contribute to trouble tickets. Embarq is also reaching out to CLECs with high levels of troubles to further investigate the issue. Embarq's account management and analysis team are working with affected CLECs to improve understanding and communication of repair issues.

Measure 18: Average Completion Notification Interval
Submeasure 18.03: Electronic-Manual Mix

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
The ACTC is not systematically being added to some orders causing manual intervention to add the ACTC. The manual adding of ACTC does not always occur within our objective. An out with Sever Spice due to relocation caused serious errors	2Q2007	3Q2008	24% 47% 30% 60%		Embarq has been working with the NEAC and ARC trying to develop a corrective plan. Embarq's vendor has delivered a possible fix to the issue where Order Path was sending messages to Server SPICE on intra-company ports and disconnects. The fix will need to be tested prior to being placed into production.

Measure 19: Customer Trouble Report Rate
Submeasure 19.143: UNE DS1/ISDN PRI

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
79% of outages due to facility issues involving defective/damaged cable; of these 26% (or 21% of total) were due to third party cuts or lightning damage (just one ticket was due to lightning). Three tickets were due to defective/deteriorated central office equipment, and two were due to errors in the cross connect panel.	8/01/07	2@2008	1.78%		Damaged and defective equipment was repaired and/or replaced; errors were corrected.



Measure 19: Customer Trouble Report Rate
Submeasure 19.147: EELS

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
FL experienced 36% due to lightning. Four tickets were due to loose or damaged equipment and the remainder were to due defective/deteriorated equipment.	10/1/07	1Q2008			Damaged and defective equipment was repaired and/or replaced. This is compliant for this month.

Measure 20: Percentage of Customer Trouble Not Resolved within Estimated Time

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Submeasure 20.101.01: UNE Loops xDSL Provisioned - Dispatch Of the 9 commitments missed 1 was due to work load, 8 had to be referred to HSI or ISDN capable technicians.	11/1/07	1Q2008	30%	1Q2008	Dynamic dispatching, which was implemented Nov 1st, should improve the situation of tickets having to be referred to HSI or ISDN technicians. This new dispatching method should allow WFM to load tickets behind technicians who have the skill set to work on HSI or ISDN tickets.

Measure 32: Recurring charge completeness
Submeasure 32.02: UNE

Description of Issue	Start Date	Projected Improvement	Estimated Impact	End Date	Improvement Plan
Volumes of orders in addition to Server SPICE problems contributed to the non-compliance of this measure.	4Q 2007	2Q 2008	11.39%	1Q2008	Centers are working on clearing back log off orders and will bring accounts current in January