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June 13, 2007

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

Re: Docket No. 000121A-TP
**In Re: Investigation into the establishment of operations support systems
permanent incumbent local exchange Telecommunications companies**

Dear Ms. Cole:

In connection with the workshop scheduled to commence on August 1, 2007, in the above reference docket, please find enclosed the information the Commission Staff requested from AT&T Florida in its notice of workshop dated May 2, 2007

A copy of the same is being provided to all parties as reflected in the attached certificate of service.

Sincerely,

Robert A. Culpepper

Enclosures
cc: All parties of record
Jerry D. Hendrix

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CERTIFICATE OF SERVICE
Docket No. 000121A-TP

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

Electronic Mail and U.S. Mail this 13th day of June, 2007 to the following:

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**(+) Signed Protective
Agreement**

#502166

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment)
of operations support systems)
permanent performance measures for)
incumbent local exchange)
telecommunications companies.)
(BELLSOUTH TRACK))

Docket No.: 000121A-TP

Filed: June 13, 2007

COMMENTS AND SUPPORTING DOCUMENTATION OF AT&T FLORIDA
REGARDING CURRENT LEVELS OF FLOW-THROUGH
AND VALID/INVALID CLARIFICATIONS

As directed by the Staff of the Florida Public Service Commission (“Staff”) in its Notice of Meeting/Workshop Hearing dated May 2, 2007, BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”) hereby submits its comments and supporting documentation regarding certain ordering-related issues raised during the most recent periodic review of AT&T Florida’s Performance Assessment Plan (collectively, “SQM/SEEM Plan”). Specifically, AT&T Florida submits herein, as Exhibit “A”, Florida aggregate flow-through volumes for each month since October 2006, by product type, planned manual fall-out, and the number of valid and invalid rejects/clarifications.

The current Florida Service Quality Measurement plan (“SQM plan”), dated November 1, 2006, requires that AT&T Florida report monthly flow-through results by four (4) product categories. These product categories are: Residence, Business, UNE-L (includes UNE-L with LNP) and LNP. AT&T Florida reports these results per the metric Percent Flow-Through Service Requests (O-3) on a regional basis as required by the SQM plan. Exhibit “A” contains Florida specific data and, among other things, identifies on a monthly basis: the level of Local

Service Request (“LSR”) Submissions, Total Manual Fallout (which is planned manual fallout), the number of Validated LSRs, and the actual Percent Flow-Through.

As Staff will recall, in the recent periodic review of the SQM/SEEM Plan, Staff requested data related to the Florida aggregate number of LSRs rejected in error for a six-month period. On September 29, 2006, AT&T Florida (then known as BellSouth) filed with the Commission its response to that request as Action Item No. 8 (b). In its response, AT&T Florida indicated that there was no practical way to count the number of LSRs clarified in error by its service representatives because this would require a manual review of LSRs. Therefore, for purposes of estimating the number of LSRs rejected in error by a service representative, AT&T Florida assumed that for any partially mechanized LSR that was clarified and an associated Firm Order Confirmation (“FOC”) subsequently sent, with no change in the version of the LSR, the LSR was clarified in error. This is the same approach used for this filing and the corresponding estimates are provided in Table 1 below.

| TABLE 1 –Florida Results Only | | | | |
|--------------------------------------|---|-----------------------------|--|---------------------------------------|
| Month | Total Mechanized LSR Submissions | Total LSRs Clarified | Estimated # of LSRs Clarified in Error By Service Reps. | Estimated % Clarified in Error |
| Oct-06 | 84236 | 10062 | 260 | 2.58% |
| Nov-06 | 72994 | 9637 | 227 | 2.36% |
| Dec-06 | 71265 | 8925 | 276 | 3.09% |
| Jan-07 | 91331 | 10421 | 260 | 2.49% |
| Feb-07 | 77011 | 9864 | 165 | 1.67% |
| Mar-07 | 87255 | 11739 | 194 | 1.65% |
| Apr-07 | 84721 | 11503 | 158 | 1.37% |
| Total | 568813 | 72151 | 1540 | 2.13% |

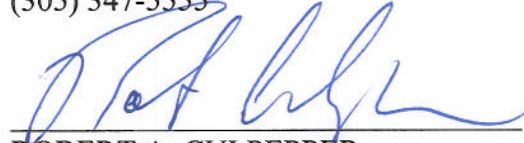
In sum, a review of the results provided above shows that for the period October 2006 through April 2007, about 2% of the LSRs were clarified in error by a service representative. Considering that over 568,000 LSRs were submitted electronically during this time frame, the estimated percent clarified in error by a service representative represents only about 0.27% of the total electronic submissions. Given the fact that the vast majority of LSRs are submitted electronically (approximately 95% based on a recent review of Florida data), the data demonstrates that a very small percentage of LSRs are clarified in error by a service representative.

Similarly, the flow-through results shown in Exhibit "A" demonstrate that AT&T Florida consistently meets the benchmark for the specified products as required by the Florida SQM plan. Specifically, the benchmarks for the product categories Residence, Business, UNE-L (includes UNE-L with LNP) and LNP are 95%, 90%, 85%, and 95% respectively. In every month over the 7-month period from October 2006 to April 2007, AT&T Florida exceeded the benchmark for each of these product categories.

Respectfully submitted this 13th day of June, 2007.

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RESIDENCE DETAIL AT&T FLORIDA

| RESIDENCE ORDER TYPES | | | | | | | | | | | | | | | LSR PROCESSING | | | | | FLOWTHROUGH | | | |
|-----------------------|-------|---------------------------|------|-------|------------------|----------------------|--------------------|---------|---------------|-------|----------------------|--------------------|---------------------|--------|----------------|------------------------------|------------------|------------------------------|--|-------------|------------------|--|--|
| LSR SUBMISSION | | | | | | | | | | | | | | | Validated | | | Percent Achieved Flowthrough | | | Base Calculation | | |
| Month | LENS | Mechanized Interface Used | | | Total Mech LSR's | Manual | | Rejects | Pending Supps | LSR's | Total System Fallout | Errors | | | Issued SO's | Percent Achieved Flowthrough | Base Calculation | Percent Flow Through | | | | | |
| | | EDI | TAG | | | Total Manual Fallout | Auto Clarification | | | | | BST Caused Fallout | CLEC Caused Fallout | | | | | | | | | | |
| Oct-06 | 17601 | 28738 | 5281 | 51620 | 3437 | 6377 | 110 | 41696 | 794 | 483 | 311 | 40902 | 91.25% | 98.10% | 98.83% | | | | | | | | |
| Nov-06 | 12924 | 27601 | 4929 | 45454 | 2997 | 6405 | 90 | 35962 | 1029 | 687 | 342 | 34933 | 90.46% | 97.14% | 98.07% | | | | | | | | |
| Dec-06 | 12697 | 23396 | 5027 | 41120 | 3162 | 5442 | 67 | 32449 | 1113 | 802 | 311 | 31336 | 88.77% | 96.57% | 97.50% | | | | | | | | |
| Jan-07 | 19231 | 29666 | 6006 | 54903 | 3197 | 6441 | 114 | 45151 | 1646 | 1070 | 576 | 43505 | 91.07% | 96.35% | 97.60% | | | | | | | | |
| Feb-07 | 12308 | 28903 | 5701 | 46912 | 3785 | 6755 | 109 | 36263 | 1328 | 932 | 396 | 34935 | 88.10% | 96.34% | 97.40% | | | | | | | | |
| Mar-07 | 13714 | 34516 | 6606 | 54836 | 3499 | 8005 | 105 | 43227 | 1644 | 832 | 812 | 41583 | 90.57% | 96.20% | 98.04% | | | | | | | | |
| Apr-07 | 12663 | 35293 | 7416 | 55372 | 3423 | 8376 | 87 | 43486 | 1020 | 486 | 534 | 42466 | 91.57% | 97.65% | 98.87% | | | | | | | | |

BUSINESS DETAIL AT&T FLORIDA

| BUSINESS ORDER TYPES | | | | | | | | | | | | | | FLOWTHROUGH | | | |
|----------------------|------|---------------------------|-----|------|------------------|----------------------|----------------------|---------|---------------|----------------|--------------------|---------------------|--------|-------------|------------------------------|------------------|----------------------|
| LSR SUBMISSION | | | | | | | | | | LSR PROCESSING | | | | | | | |
| Month | LENS | Mechanized Interface Used | | | Total Mech LSR's | Manual | | Rejects | Pending Supps | Validated | Errors | | | Issued SO's | Percent Achieved Flowthrough | Base Calculation | Percent Flow Through |
| | | EDI | TAG | | | Total Manual Fallout | Total System Fallout | | | | BST Caused Fallout | CLEC Caused Fallout | | | | | |
| Oct-06 | 1907 | 1916 | 15 | 3838 | 574 | 370 | 11 | 2883 | 205 | 140 | 65 | 2678 | 78.95% | 92.89% | 95.03% | | |
| Nov-06 | 1822 | 1664 | 59 | 3545 | 722 | 349 | 13 | 2461 | 244 | 157 | 87 | 2217 | 71.61% | 90.09% | 93.39% | | |
| Dec-06 | 1736 | 1547 | 34 | 3317 | 463 | 363 | 12 | 2479 | 255 | 180 | 75 | 2224 | 77.57% | 89.71% | 92.51% | | |
| Jan-07 | 2150 | 1994 | 42 | 4186 | 565 | 440 | 17 | 3164 | 251 | 173 | 78 | 2913 | 79.79% | 92.07% | 94.39% | | |
| Feb-07 | 1832 | 1674 | 36 | 3542 | 738 | 325 | 18 | 2461 | 187 | 129 | 58 | 2274 | 72.40% | 92.40% | 94.63% | | |
| Mar-07 | 2017 | 2181 | 30 | 4228 | 789 | 395 | 20 | 3024 | 186 | 125 | 61 | 2838 | 75.64% | 93.85% | 95.78% | | |
| Apr-07 | 1529 | 1929 | 43 | 3501 | 522 | 294 | 11 | 2674 | 186 | 121 | 65 | 2488 | 79.46% | 93.04% | 95.36% | | |

Total UNE Loops (REQTYP A & B) AT&T FLORIDA

| UNE LOOP (REQTYP A & B) ORDER TYPES | | | | | | | | | | | | | FLOWTHROUGH | | | | | |
|-------------------------------------|------|---------------------------|-----|-------|------------------|----------------------|--------------------|---------|---------------|-----------------|----------------------|--------------------|---------------------|------------------------------|------------------|----------------------|-------------|--|
| LSR SUBMISSION | | | | | | | | | | | | | LSR PROCESSING | | | FLOWTHROUGH | | |
| Month | LENS | Mechanized Interface Used | | | Total Mech LSR's | Manual | | Rejects | Pending Supps | Validated LSR's | Errors | | | Percent Achieved Flowthrough | Base Calculation | Percent Flow Through | | |
| | | EDI | TAG | | | Total Manual Fallout | Auto Clarification | | | | Total System Fallout | BST Caused Fallout | CLEC Caused Fallout | | | | Issued SO's | |
| Oct-06 | 814 | 15306 | 57 | 16177 | 1813 | 891 | 128 | 13345 | 1372 | 662 | 710 | 11973 | 82.87% | 89.72% | 94.76% | | | |
| Nov-06 | 460 | 11417 | 44 | 11921 | 1704 | 814 | 107 | 9296 | 957 | 607 | 350 | 8339 | 78.30% | 89.71% | 93.21% | | | |
| Dec-06 | 364 | 14284 | 52 | 14700 | 2772 | 994 | 113 | 10821 | 1113 | 691 | 422 | 9708 | 73.71% | 89.71% | 93.36% | | | |
| Jan-07 | 499 | 17115 | 45 | 17659 | 2535 | 940 | 110 | 14074 | 1346 | 846 | 500 | 12728 | 79.01% | 90.44% | 93.77% | | | |
| Feb-07 | 384 | 12554 | 43 | 12981 | 1509 | 705 | 100 | 10667 | 830 | 498 | 332 | 9637 | 83.05% | 92.22% | 95.18% | | | |
| Mar-07 | 318 | 12895 | 39 | 13252 | 1629 | 714 | 114 | 10795 | 935 | 506 | 429 | 9860 | 82.20% | 91.34% | 95.12% | | | |
| Apr-07 | 357 | 12160 | 82 | 12599 | 1421 | 754 | 94 | 10330 | 795 | 483 | 312 | 9535 | 83.36% | 92.30% | 95.18% | | | |

LNP (REQTYP C) AT&T FLORIDA

| LNP (REQTYP C) ORDER TYPES | | | | | | | | | | | | FLOWTHROUGH | | | | | |
|----------------------------|------|---------------------------|------|-------|------------------|----------------------|--------------------|---------|---------------|-----------|----------------------|--------------------|---------------------|------------------------------|------------------|----------------------|-------------|
| LSR SUBMISSION | | | | | | | | | | | | LSR PROCESSING | | | FLOWTHROUGH | | |
| Month | LENS | Mechanized Interface Used | | | Total Mech LSR's | Manual | | Rejects | Pending Supps | Validated | Errors | | | Percent Achieved Flowthrough | Base Calculation | Percent Flow Through | |
| | | EDI | TAG | | | Total Manual Fallout | Auto Clarification | | | | Total System Fallout | BST Caused Fallout | CLEC Caused Fallout | | | | Issued SO's |
| Oct-06 | 2479 | 7688 | 2434 | 12601 | 3530 | 681 | | | 8390 | 749 | 92 | 657 | 7641 | 91.07% | 98.81% | | |
| Nov-06 | 2436 | 6990 | 2648 | 12074 | 3493 | 672 | | | 7909 | 730 | 112 | 618 | 7179 | 90.77% | 98.46% | | |
| Dec-06 | 2368 | 7021 | 2739 | 12128 | 3507 | 613 | | | 8008 | 797 | 92 | 705 | 7211 | 90.05% | 98.74% | | |
| Jan-07 | 2640 | 8501 | 3442 | 14583 | 3799 | 554 | | | 10230 | 1012 | 120 | 892 | 9218 | 90.11% | 98.71% | | |
| Feb-07 | 2357 | 8121 | 3098 | 13576 | 3491 | 509 | | | 9576 | 913 | 129 | 784 | 8663 | 90.47% | 98.53% | | |
| Mar-07 | 2659 | 9274 | 3006 | 14939 | 4016 | 584 | | | 10339 | 840 | 101 | 739 | 9499 | 91.88% | 98.95% | | |
| Apr-07 | 2562 | 8234 | 2453 | 13249 | 3613 | 517 | | | 9119 | 718 | 67 | 651 | 8401 | 92.13% | 99.21% | | |