## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION Tallahassee, Florida 32399-0850

In the Matter of		
Saturn Telecommunic Services Inc., a Florid Corporation		)
	Complainant,	)
v.		)
BellSouth Telecommunications, Florida Corporation d/b/a AT&T	Inc., a	() () () ()
	Respondents	)

AFFIDAVIT OF CESAR LUGO

State of Florida	}
	}ss
County of Broward	}

- 1) My name is Cesar Lugo and the following information is true and correct based upon my personal knowledge. I am over the age of 18 and am making this affidavit under penalties of perjury. My business address is 12399 SW 53rd Street Cooper City, Florida 33330.
- 2) My title is Provisioning and Billing Supervisor for Saturn Telecommunication Services, Inc. (d/b/a/ STS Telecom, hereafter "STS").
- 3) I have worked for BellSouth, now d/b/a AT&T in 2003-2005 as a customer service/sales associate in the Miami, Florida location
- 4) While I was there, we were trained to use their OSS systems
  - a) RNS (Regional Navigation System)
  - b) MAX
  - c) MOBI
    - i) RNS was used for:
      - (a) Viewing customer's information
      - (b) Viewing Pending Orders
      - (c) Issuing Orders
    - ii) MAX was used for:
      - (a) Having a quick glance at the customer's records for a potential sale
    - iii) MOBI was used for:
      - (a) Viewing billing records that were more than 6 months old
      - (b) Viewing Pending Orders (including tech notes)

(c) Issuing Orders (since MAX was created to take the place of MOBI, we were

not fully trained on how to issue orders on this system)

5) Issuing orders via RNS was simple to do and we were trained to issue orders ONLY when

we have the customer on the line. We were not allowed to access an account without having

the customer on the phone. Therefore, Bellsouth d/b/a AT&T, RNS system was created to

have orders placed in error-free status 99% of the time so the reps will not have to go back

and correct the errors after the customer hung up.

6) When we issued orders via RNS, if we selected an item or a choice that was invalid, the

submit option at the end of the order was not highlighted and on the screen it would tell us

what the error(s) were, therefore, it forced us to go back to correct the error(s). We were not

able to submit an order with an incorrect field in RNS just as today we are not able to submit

an incorrect order in LENS.

7) Just like the way CLECs use LENS today, there are fields in LENS that if they are not

populated or has incorrect data, LENS will not allow CLECs to issue the order until these

fields are corrected.

FURTHER AFFIANT SAYETH NOT

THE REMAINDER OF THIS PAGE LEFT INTENTIONALLY BLANK. SIGNATURE PAGE TO

FOLLOW.

CESAR/LUGO

BEFORE ME, the undersigned authority, on this 2 day of September 2009 personally appeared CESAR LUGO, who is personally known to me or produced as identification, and who after being first duly sworn deposes and says that he had read the foregoing Affidavit, that the information contained therein is true and correct and based upon his personal knowledge.

NOTARY PUBLIC

ANDREW T. SILBER
MY COMMISSION # DD 557657
EXPIRES: May 30, 2010
Bonded Thru Notary Public Underwater:

Print Name:

Commission No.: