

ORIGINAL

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Sent: Thursday, March 17, 2005 11:25 AM
To: Filings@psc.state.fl.us
Cc: Edenfield, Kip; Fatool, Vicki; Slaughter, Brenda ; Linda Hobbs; Bixler, Micheale; Nancy Sims; Holland, Robyn P
Subject: Florida Docket No. 041338-TP
Importance: High
Attachments: BellSouth.pdf; BellSouth.doc

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 COM _____
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 OTH kinf.

B. Docket No. 041338-TP: Petition for Generic Proceeding to Set Rates, Terms and Conditions for
 Batch Hot Cuts for UNE-P to UNE-L Conversions and for ILEC to UNE-L
 Conversions in the BellSouth Telecommunications, Inc. Service Area

C. BellSouth Telecommunications, Inc.
 on behalf of E. Earl Edenfield, Jr.

D. 8 pages total in PDF format
 5 pages total (WORD - in lieu of disk)

E. BellSouth's Proposed Procedural Schedule and Comments on Staff's Proposed Issues List.

<<BellSouth.pdf>> <<BellSouth.doc>>

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March 17, 2005

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

**Re: Docket No.: 040301-TP
Petition of Supra Telecommunications and Information Systems, Inc. for
Arbitration with BellSouth Telecommunications, Inc.**

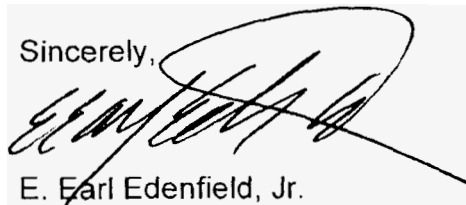
**Docket No. 041338-TP
Petition for Generic Proceeding to Set Rates, Terms and Conditions for
Batch Hot Cuts for UNE-P to UNE-L Conversions and for ILEC to UNE-L
Conversions in the BellSouth Telecommunications, Inc. Service Area**

Dear Ms. Bayó:

Enclosed is BellSouth's Proposed Procedural Schedule and Comments on Staff's Proposed Issues List, which we ask that you file in the captioned docket.

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

Sincerely,



E. Earl Edenfield, Jr.

Enclosure

cc: All Parties of Record
Marshall M. Criser III
Nancy B. White
R. Douglas Lackey

CERTIFICATE OF SERVICE
Docket Nos. 040301-TP & 041338-TP

HEREBY CERTIFY that a true and correct copy of the foregoing was served
via Electronic Mail and/or U.S. Mail this 17th day of March, 2005 to the following:

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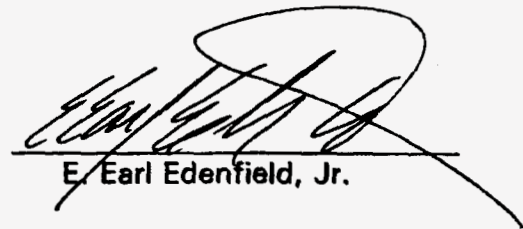
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To receive discovery related material only

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E. Earl Edenfield, Jr.

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Generic Proceeding to Set)	
Rates, Terms, and Conditions for Batch Hot)	Docket No. 041338-TP
Cuts for UNE-P to UNE-L Conversions and for)	
ILEC to UNE-L Conversions in the BellSouth)	
Telecommunications, Inc. Service Area)	Filed: March 17, 2005
_____)		

BELLSOUTH'S PROPOSED PROCEDURAL SCHEDULE AND COMMENTS ON STAFF'S PROPOSED ISSUES LIST

BellSouth Telecommunications, Inc. ("BellSouth") files this Proposed Procedural Schedule and Comments on Staff's Proposed Issues List, and says:

COMMENTS ON STAFF'S PROPOSED ISSUES LIST

Staff Proposed Issue 5: Should a CLEC be permitted to select, for UNE-P to UNE-L conversions where the UNE-P is not provisioned via IDLC, how the UNE-L should be provisioned?

Staff Proposed Issue 6: If a CLEC is permitted to select the implementation method for BellSouth to use to perform a UNE-P to UNE-L conversion where the UNE-P is not served by IDLC, what impacts, if any, are there on the resulting UNE-L recurring rates?

BellSouth's Comments: These issues (5 and 6) appear to have been added only for purposes of symmetry vis-à-vis Staff Proposed Issues 2 and 3. The same alternative methods for implementation related to IDLC do not exist (and are not necessary) for UDLC and copper. Thus, BellSouth submits that these issues are unnecessary and should be deleted.

Staff Proposed Issue 7: What is a reasonable interval for BellSouth to complete a hot cut for each of the following scenarios:

BellSouth's Comments: These comments apply to all of the charts contained within Staff's Proposed Issues List (Staff Proposed Issues 7, 9 and 17) as well as the discussion

requested by Staff regarding opinions on the separation of this Docket into phases. Specifically, BellSouth submits that the following scenarios should be considered in an initial phase: (1) UNE-P to UNE-L where the lines being converted are served by copper or UDLC and are being converted to either SL1 loops or SL2 loops; (2) UNE-P to UNE-L where the lines being converted are *not* served by copper or UDLC and are being converted to either SL1 loops or SL2 loops; and (3) Resale to UNE-L where UNE-L is defined as either an SL1 loop or SL2 loop. Although BellSouth has procedures in place today that allow CLECs to order conversions (both individually and in bulk) for other situations; e.g., the conversion of retail lines and line sharing/ line splitting arrangements, the above referenced scenarios are the only scenarios that are directly impacted by the FCC's directive to the CLECs to convert their embedded base of UNE-P customers before March 12, 2006.

BellSouth objects to the issues related to stand-alone LNP, as number portability does not require the moving of loop facilities from one switch to another. Further, the Commission already has provisioning intervals and rates for stand-alone LNP.

The remaining issues should be placed in a separate phase of this docket to commence upon the conclusion of the first phase. While BellSouth will continue working on the cost studies associated with these remaining issues throughout the duration of the first phase of this Docket, BellSouth is concerned that a testimony and discovery schedule on dual phases might jeopardize the timing of the first phase. BellSouth will have the cost studies for the second phase issues ready to be filed at the conclusion of the first phase, which should significantly shorten the procedural schedule for the second phase.

Staff Proposed Issue 8: Should BellSouth's batch hot cut process allow for: a) CLECs to connect loops directly to third party switches; and b) the same CLEC to convert from UNE-P to UNE-L?

BellSouth's Comments: BellSouth supports the re-write of this issue (breaking it into two separate questions) as proposed by Supra. BellSouth understands those issues to be: (1) Should BellSouth's batch hot cut process allow for CLECs to connect loops directly to third party switches; and (2) Should BellSouth's CLEC to CLEC conversion process allow for any one CLEC entity to convert customers from a UNE-P OCN to a UNE-L OCN belonging to the same entity, regardless of whether or not the OCNs are the same or different.

Staff Proposed Issue 9: Does BellSouth have current processes in place, including a batch process, that provide for a seamless migration for each of the following scenarios? Are the terms and conditions associated with these processes appropriate? If not, what terms and conditions should be adopted?

BellSouth's Comments: In addition to BellSouth's earlier comments regarding the chart, BellSouth objects to overly-general wording of this issue. Throughout the discussions with Staff and the CLECs, BellSouth has maintained the position that generalities are not conducive to resolving specific process concerns. With the exception of this question, all of the other process issues are stated with enough particularity for BellSouth to understand and address. Frankly, this issue adds nothing that is not already captured in the other more specific issues, including the scope of this proceeding, which will ultimately be defined in the chart attached to Staff Proposed Issues 7 and 17. Thus, BellSouth proposes that this issue be removed from the list.

Staff Proposed Issue 19: Is BellSouth required to provide loop sharing where the cross-connection between two different CLECs or between the same CLEC is completed by BellSouth at the Central Office Main Distribution Frame (MDF)? If so, what is the process for ordering and provisioning this service and what are the appropriate recurring rates?

BellSouth's Comments: BellSouth's concern with the issue as written is that it seems to combine a process question and a rate question. BellSouth proposes that the issue be re-written as follows: "If BellSouth is required to provide loop sharing where the cross-connection between two different CLECs or between the same CLEC is completed by BellSouth at the Central Office Main Distribution Frame (MDF) then what are the appropriate recurring rates?"

Staff Proposed Issue 22: Should BellSouth create a nonrecurring rate for Supra that applies for a hot cut from UNE-P to UNE-L, where the lines being converted are served by copper or UDLC, for (a) SL1 loops and (b) SL2 loops?

Staff Proposed Issue 23: Should BellSouth create a nonrecurring rate for Supra that applies for a hot cut from UNE-P to UNE-L, where the lines being converted are not served by copper or UDLC, for (a) SL1 loops and (b) SL2 loops

BellSouth's Comments: BellSouth objects to these issues as they have been subsumed into the other issues in this Docket. Such a result is consistent with, if not required by, the Commission's order consolidating these proceedings wherein the Commission ruled that "[o]nly Issues 1 and 2 in Docket 040301-TP are unique to BellSouth and Supra. Supra has agreed to withdraw those issues after the hearing in Docket No. 040301-TP. The remaining issues are virtually identical to the Joint CLEC's petition in Docket 041338-TP." (Order No. PSC-05-0157-PCO-TP, at 4) (Emphasis added) Thus, these issues should be removed.

BellSouth New Proposed Issue: "Are BellSouth's existing SEEMs and SQMs impacted by the issues in this Docket? If so, what modifications, if any, should be made to those existing SEEMs and SQMs?" BellSouth believes this issue is necessary given the potential for existing provisioning intervals to be modified as a result of the issues being addressed in this Docket.

PROPOSED SCHEDULE

BellSouth has made the decision to have an independent expert conduct time and motion studies on the activities necessary for conversions. BellSouth anticipates that having such an

independent study with greatly reduce the time associated with discovery as well as the number of witnesses generally required in a cost docket. That said, BellSouth proposes the following schedule for the first phase of this Docket.

August 15, 2005 - BellSouth files Cost Studies and Direct Testimony

September 30, 2005 – CLECs file Rebuttal Testimony

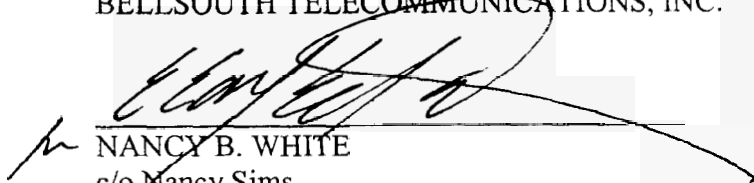
October 12, 2005 – BellSouth files Sur-Rebuttal testimony

November 1-3, 2005 – Hearing

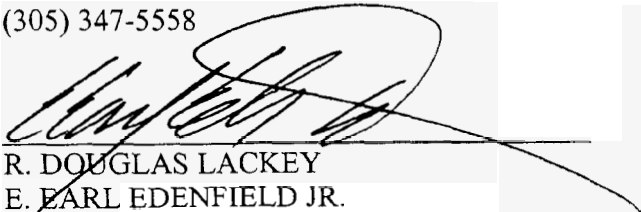
November 21, 2005 – Briefs

Respectfully submitted this 17th day of March 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



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