ANDREW D. SHORE Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0765

April 8, 2005

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

> Re: 041114-TP - Complaint of XO Florida, Inc. Against BellSouth Telecommunications, Inc. for Refusal to Convert Circuits to UNEs and for Expedited Processing

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Supplemental Direct Testimony Shelley W. Padgett, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark 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,

Irem D. Shore Andrew D. Shore

Enclosures

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

CERTIFICATE OF SERVICE DOCKET NO. 041114-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express (*), Electronic Mail and First Class U.S. Mail this 8th day of April, 2005 to the following:

Jason Rojas (*)
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Andrew D. Shore

1		BELLSOUTH TELECOMMUNICATIONS, INC.								
2	SUPPLEMENTAL DIRECT TESTIMONY OF									
3	SHELLEY W. PADGETT									
4	BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION									
5	DOCKET NO. 041114-TP									
6		APRIL 8, 2005								
7										
8	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.								
9										
10	A.	My name is Shelley W. Padgett. My business address is 675 W. Peachtree Street,								
11		Atlanta, Georgia 30375.								
12										
13	Q.	ARE YOU THE SAME SHELLEY W. PADGETT WHO PROVIDED DIRECT								
14		AND REBUTTAL PANEL TESTIMONY IN THIS DOCKET?								
15										
16	A.	Yes.								
17										
18	Issue	4a: If the Commission finds in favor of XO on Issue 1, which of XO's circuits								
19	would	d be eligible for conversion?								
20										
21	Q.	WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?								
22										
23	A.	If the Commission finds in favor of XO on Issue 1, which it should not for								
24		reasons explained in detail in my earlier panel testimony with Ms. Willis, the								
25		Commission should only allow XO to convert Special Access ("SPA") circuits								

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1		that would be converted to stand-alone UNE loops. These circuits are listed in
2		Exhibit SWP-1.
3		
4	Q.	IF THE COMMISSION ALLOWS THE REQUESTED CONVERSIONS AT
5		ALL, WHY SHOULD IT ALLOW CONVERSION OF ONLY THOSE SPA
6		CIRCUITS THAT WOULD CONVERT TO STAND-ALONE UNE LOOPS?
7		
8	A.	XO claims that the UNE conversion portion of the FCC's Triennial Review Order
9		("TRO") was self-effectuating. Even if the Commission agrees with XO, which it
10		should not, XO has not argued that the FCC intended any other portions of the
11		TRO to be self-effectuating.
12		
13		The FCC did make clear, however, that there are requirements that loops
14		combined with other elements must meet in order to convert any portion of the
15		combination. To the extent XO seeks to convert loops combined with other
16		elements, until its Interconnection Agreement is amended to include both the
17		rights and the accompanying responsibilities, XO should not be allowed to
18		convert these elements. At such time as XO has amended its Interconnection
19		Agreement to include these provisions, as well as the other changes necessitated
20		by the changes in law that have occurred, XO will have the ability to convert the
21		circuits it seeks to convert, provided that it can comply with the relevant terms of
22 23		the Interconnection Agreement.
24	Q.	HAS XO REQUESTED THAT BELLSOUTH BE REQUIRED TO CONVERT
25		ANYTHING OTHER THAN STAND-ALONE LOOPS?

1 A. Yes. XO has submitted in its various conversion requests 510 circuits in Florida 2 that are more than stand-alone loops. These include: 1) EELs and commingled EELs, 2) loops connected to BellSouth® SMARTRing® or BellSouth® LightGate® 3 4 or other services that do not terminate at a collocation arrangement, 3) local 5 channels or entrance facilities, 4) other circuits with no loop equivalent, and 5) a 6 circuit that BellSouth was already billing as a UNE. 7 8 Q. WHAT IS AN EEL? 9 10 A. The FCC defines an EEL, in paragraph 571 of the TRO as, "a UNE combination 11 consisting of an unbundled loop and dedicated transport and may sometimes 12 include additional electronics (e.g., multiplexing equipment)." 13 14 Q. WHAT DOES "COMMINGLING" MEAN? 15 16 A. The FCC defined commingling in paragraph 579 of the TRO as "the connecting, 17 attaching, or otherwise linking of a UNE, or a UNE combination, to one or more 18 facilities or services that a requesting carrier has obtained at wholesale from an 19 incumbent LEC pursuant to any method other than unbundling under section 20 251(c)(3) of the Act, or the combining of a UNE or UNE combination with one or 21 more such wholesale services." For example, in the case of a commingled EEL, 22 either the loop or the transport portion of the EEL would be a UNE and the other 23 portion of the EEL would be a SPA or other wholesale service, including

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BellSouth® SMARTRing® service.

24

25

1	Q.	WHAT REQUIREMENTS HAS THE FCC ESTABLISHED FOR
2		COMMINGLED EELS?
3		
4	A.	In the TRO, the FCC set forth "service eligibility criteria" for EELs and any
5		portion of an EEL that a CLEC wishes to obtain at UNE rates. Paragraph 593 of
6		the TRO says: "To ensure that our rules on service eligibility are not gamed in
7		whole or in part, we make clear that the service eligibility criteria must be
8		satisfied (1) to convert a special access circuit to a high-capacity EEL; (2) to
9		obtain a new high-capacity EEL; or (3) to obtain at UNE pricing part of a high-
10		capacity loop-transport combination (commingled EEL)."
11		
12		The service eligibility criteria are set forth in paragraph 597. A CLEC must
13		satisfy each of the following in order to qualify for EEL or commingled EEL as a
14 15		UNE:
16		1) the CLEC must be certificated by the state to provide local voice service;
17 18 19		2) there must be at least one local number assigned to each circuit and there must be 911 or E911 capability on each circuit; and
20 21 22		3) the following architectural safeguards must be met:
23 24 25		a) each circuit must terminate at an ILEC central office in the same LATA as the customer premises;
26 27 28		b) each circuit must be served by an interconnection trunk in the same LATA as the customer premises;
29 30 31		c) for every 24 DS1 EELs or the equivalent, the CLEC must maintain at least one active DS1 local service interconnection trunk; and
32 33		d) each circuit must be service by a Class 5 switch or other switch capable of providing local voice traffic.

1	Q.	ARE THESE PROVISIONS OF THE TRO SELF-EFFECTUATING?
2		
3	A.	No. There is no indication that the FCC intended these provisions to be self-
4		effectuating. To the contrary, paragraph 701 states, in part:
5 6 7 8 9 10 11 12 13 14 15 16		Thus, to the extent our decision in this Order changes carriers' obligations under section 251, we decline[to] override the section 252 process and unilaterally change all interconnection agreements to avoid any delay associated with renegotiation of contract provisions. Permitting voluntary negotiations for binding interconnection agreements is the very essence of section 251 and section 252. We do not believe that the lag involved in negotiating and implementing new contract language warrants the extraordinary step of the Commission interfering with the contract process.
17 18		(Footnote omitted, emphasis added).
19	Q.	HAS XO REQUESTED CONVERSIONS FOR EELS AND
20		COMMINGLED EELS?
21		
22	A.	Yes. XO has submitted requests for 89 circuits that are loops combined with
23		transport and which terminate in a collocation arrangement. These circuits are
24		listed in Exhibit SWP-2. XO has had the option for several years to convert such
25		combinations to EELs, provided that the circuits meet the "significant amount of
26		local usage" requirements set forth in the parties' Interconnection Agreement.
27		
28		However, to the extent that XO does not seek to convert the entire combination to
29		an EEL, its current Interconnection Agreement with BellSouth does not allow XC
30		to convert only a portion of the combination to UNEs. To do so would create a

1		"commingled EEL" - a UNE combined with a special access ("SPA") service.
2		XO's current Interconnection Agreement does not have any provisions for
3		commingling and it certainly does not contain provisions for the specific
4		requirements for commingled EELs that the TRO sets forth.
5		
6	Q.	PLEASE EXPLAIN THE SECOND CATEGORY: LOOPS CONNECTED TO
7		BELLSOUTH® SMARTRING® OR BELLSOUTH® LIGHTGATE® SERVICE
8		THAT DO NOT TERMINATE AT A COLLOCATION ARRANGEMENT.
9		
10	A.	XO has submitted requests for 300 circuits that are loops combined with
11		BellSouth® SMARTRing® or BellSouth® LightGate® or other service, either
12		directly or through other SPA transport, that do not terminate at a collocation
13		arrangement. These circuits are listed in Exhibit SWP-3. These circuits cannot,
14		under the current Interconnection Agreement, qualify for conversion to UNEs
15		and, under the provisions of the TRO, they will not qualify for conversion to
16		UNEs because they are EELs but do not terminate in a collocation arrangement a
17		required pursuant to the service eligibility criteria previously described.
18		
19	Q.	WHAT IS BELLSOUTH® SMARTRING® SERVICE?
20		
21	A.	BellSouth's website describes BellSouth® SMARTRing® service as "a SONET-
22		based self-healing network with a ring architecture that ensures no single channel
23		outage can interrupt service." The service is designed to prevent service outages
24		by providing diverse routing of traffic. The network is constructed as two

1 concentric rings that connect nodes in customer locations and in BellSouth central 2 offices. 3 WHAT IS BELLSOUTH® LIGHTGATE® SERVICE? Q. 4 5 BellSouth's website describes BellSouth® LightGate® service as "a fiber-based 6 A. 7 transport service for interconnecting carriers' premises with one another and the BellSouth network.... LightGate service switches to an alternate path in a second 8 9 cable in the event of an error - ensuring that no single sheath outage can bring down the circuits." The service is designed to prevent service outages by 10 rerouting traffic over an alternate cable in another sheath. BellSouth® LightGate® 11 12 services are designed to be used for point-to-point or hubbing. 13 WHY WOULD A LOOP CONNECTED TO BELLSOUTH® SMARTRING® OR 14 Q. BELLSOUTH® LIGHTGATE® SERVICE NEED TO TERMINATE IN A 15 16 COLLOCATION ARRANGEMENT IN ORDER TO QUALIFY FOR CONVERSION UNDER THE PROVISIONS OF THE TRO? 17 18 19 The requirement to terminate in a collocation arrangement applies to EELs and A. 20 commingled EELs. A commingled EEL, as previously described, is an EEL in 21 which either the loop or transport portions of the combination are SPA services. Therefore, a loop connected to BellSouth® SMARTRing® or BellSouth® 22 LightGate® is a combination of a loop and transport, or a commingled EEL, and it 23 must comply with the service eligibility criteria of the TRO. 24

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1 Q. HOW DID YOU DETERMINE THAT THESE CIRCUITS DO NOT 2 TERMINATE IN A COLLOCATION ARRANGEMENT? 3 The nodes of the BellSouth® SMARTRing® service are in either a customer A. 4 5 location or a BellSouth central office. If one of the nodes on the BellSouth® SMARTRing® network is cross-connected to a collocation arrangement in a 6 7 BellSouth central office, the commingled EEL would then terminate in a collocation arrangement. Although BellSouth® LightGate® services terminate in 8 9 either a customer location or a BellSouth central office, they may also terminate 10 in a collocation arrangement. However, the circuits listed in Exhibit SWP-3 do 11 not have a billing element associated with collocation cross-connect. 12 13 Q. PLEASE EXPLAIN THE THIRD CATEGORY, ENTRANCE FACILITIES. 14 15 A. XO has submitted requests for 19 circuits that are circuits that would be, if converted to UNEs, entrance facilities. These circuits are listed in Exhibit SWP-16 4. Entrance facilities are facilities that connect ILEC wire centers to CLEC wire 17 18 centers. While XO has the right to UNE entrance facilities under the terms of its 19 current Interconnection Agreement, that right was eliminated by the TRO and the Triennial Review Remand Order ("TRRO"). In footnote 1116 of the TRO, the 20 21 FCC stated: "Our determination here effectively eliminates 'entrance facilities' as 22 UNEs...." The D.C. Circuit Court of Appeals remanded the FCC's decision on 23 entrance facilities, and in the TRRO the FCC concluded again that entrance facilities should not be available as UNEs. In paragraph 141 of the TRRO, the 24

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1 FCC stated clearly: "competitive LECs are not impaired without access to 2 entrance facilities." 3 Again, under the terms of XO's current Interconnection Agreement, it could order 4 5 UNE entrance facilities; however, even if the Commission finds that the 6 conversion portions of the TRO are self-effectuating, the FCC surely did not 7 intend that XO be allowed to convert to an element which the FCC removed from 8 the UNE list in the very same order. XO cannot have it both ways: the TRO's 9 right to convert without the obligation to abide by the FCC's decisions on the UNEs that are available. 10 11 12 Q. HOW DID YOU DETERMINE THAT XO HAS REQUESTED TO CONVERT 13 CIRCUITS THAT WOULD CONVERT TO ENTRANCE FACILITIES? 14 15 Α. First, I examined the billing elements associated with each circuit. Some of these 16 circuits are associated with transport billing elements for switched services, which 17 by definition, connect BellSouth's switch to another carrier's switch. In other 18 words, these circuits carry switched access traffic to XO's point of presence 19 ("POP"). Switched access doesn't have a "loop" equivalent, as that is the 20 responsibility of the end user. Consequently, there is no "loop" to convert. Switched access trunks connecting to another carrier's POP can be ratcheted to 21 22 carry local traffic, so XO is surely not seeking to "convert" those trunks to 23 TELRIC pricing. I can only assume that XO is seeking to convert the underlying 24 facility to UNEs. This would be an entrance facility, which as I have already

explained, is not available pursuant to current law.

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1		There are also circuits which appear to be loops, but which the billing and
2		provisioning records show terminate to a known XO point-of-presence ("POP"),
3		rather than an end user. By definition, these are entrance facilities.
4		
5	Q.	PLEASE EXPLAIN THE FOURTH CATEGORY: OTHER CIRCUITS THAT
6		HAVE NO LOOP EQUIVALENT.
7		
8	A.	XO has submitted requests for 101 other circuits that do not connect to end users
9		In other words, there is no loop portion of the circuit. XO has indicated that it
10		only desires to convert the loop portion of these circuits, but there is nothing to
l 1		convert in these cases. The Commission should clarify that these circuits are not
12		at issue in this case and should not be included in any true-up calculation. These
13		circuits are listed in Exhibit SWP-5.
14		
15	Q.	IF THESE CIRCUITS ARE NOT LOOPS, WHAT ARE THEY?
16		
17	A.	Some are multiplexers; others are cross-connects or co-carrier cross-connects.
18		None has a loop billing element associated with the circuit.
19		
20	Q.	PLEASE EXPLAIN THE FIFTH CATEGORY: CIRCUITS THAT WERE
21		ALREADY BILLING AS UNES.
22		
23	A.	XO has submitted a request for 1 circuit that is associated with UNE billing
24		elements. This circuit is listed in Exhibit SWP-6. Obviously, there is no need to

convert this circuit to a UNE and the Commission should clarify that this circuit is 1 2 not at issue in this case and should not be included in any true-up. 3 4 Issue 4b: If the Commission finds in favor of XO on Issue 1, what is the appropriate 5 effective date of conversion for each eligible circuit? 6 7 WHAT IS BELLSOUTH'S POSITION REGARDING THIS ISSUE? Q. 8 9 A. As stated in the direct panel testimony of Ms. Willis and myself, the appropriate 10 effective date for conversion would be a date following an effective amendment to the parties' Interconnection Agreement making the agreement compliant with 11 current law, specifically the TRO and the TRRO, as well as receipt by BellSouth 12 13 of an accurate spreadsheet from XO listing the relevant circuits. However, if the 14 Commission finds in favor of XO and determines that XO is not required to amend its Interconnection Agreement in order to be entitled to the conversion of 15 special access to UNE provisions of the TRO, then the Commission should find 16 17 that the effective date for any conversions is thirty (30) days from the receipt of a 18 clean, error-free spreadsheet from XO pursuant to the ordering provisions in place 19 for CLECs who have amended their agreements. 20 21 Q. WHY DO THE CONVERSIONS REQUIRE A CLEAN, ERROR-FREE 22 SPREADSHEET FROM XO? 23 24 A. BellSouth cannot complete any order that is not accurate. It is, therefore, 25 dependent on XO to provide a clean, error-free order. In this instance, the

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1	mechanism in place for ordering this type of conversion is a spreadsheet. The								
2	spreadsheet requires that XO provide information regarding the circuit								
3	configuration and billing. A sample spreadsheet is attached as Exhibit SWP-7.								
4									
5	Q. WHY SHOULD THE CONVERSIONS BE EFFECTIVE THIRTY DAYS								
6	FOLLOWING RECEIPT OF A CLEAN, ERROR-FREE SPREADSHEET?								
7									
8	A. The TRO requires only that conversions "be performed in an expeditious								
9	manner," and the FCC expressed its expectation that carriers would "establish								
10	appropriate mechanisms" to implement the conversion from the CLEC's								
111	perspective (TRO, paragraph 588). Allowing thirty days after receipt of an								
12	accurate spreadsheet balances XO's desire for an expeditious order completion								
13	but still allows some time for BellSouth to actually complete the conversion.								
14									
15	Issue 4c: If the Commission finds in favor of XO on Issue 1, is XO entitled to any								
16	billing credits as a result of such conversion, and if so, what is the amount of such								
17	credit(s)?								
18									
19	Q. WHAT IS BELLSOUTH'S POSITION REGARDING THIS ISSUE?								
20									
21	A. XO is not entitled to any billing credits for conversions of stand-alone elements.								
22	As previously discussed, XO's Interconnection Agreement with BellSouth does								
23	not allow XO to request a conversion for a stand-alone element. Even if the								
24	Commission decides Issue 1 in XO's favor, BellSouth should not be penalized for								
25	complying with the terms of its Interconnection Agreement.								

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1 Q. WHY SHOULDN'T THE COMMISSION FIND THAT XO IS ENTITLED TO 2 BILLING CREDITS SINCE XO FIRST REQUESTED THESE 3 CONVERSIONS? 4 5 First, XO is not entitled to billing credits for those requests made prior to the TRO A. 6 because there was no obligation for BellSouth to convert stand-alone elements to 7 UNEs prior to the effective date of the TRO. The FCC had never before ordered 8 that ILECs were required to convert stand-alone elements. In paragraph 585 of 9 the TRO, the FCC said: "We decline...to adopt rules establishing specific procedures...." (emphasis added) and "...carriers can establish any necessary 10 procedures to perform conversions...." (emphasis added). In the next paragraph, 11 the FCC stated: "We conclude that carriers may both convert UNEs and UNE 12 combinations to wholesale services and convert wholesale service to UNEs and 13 UNE combinations..." This language makes clear that this was a new 14 15 requirement, and not a modification of any previous requirement. 16 17 That point is also made clear by comparing the above language to the language in 18 the TRO addressing combinations. The FCC stated in Paragraph 573: "We 19 reaffirm our existing rules regarding UNE combinations." (emphasis added) Paragraph 574 says: "We reiterate the conditions that apply to the duty of 20 [ILECs] to provide UNE combinations upon request..." (emphasis added). In 21 addition, paragraph 575 says: "...our rules currently require [ILECs] to make 22 UNE combinations...available...." (emphasis added). 23

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Autor. Since no obligation existed for BellSouth to convert stand-alone elements to 2 UNEs, XO is not entitled to billing credits for those requests made prior to the TRO. 3 4 5 Second, for those requests made after the effective date of the TRO, BellSouth 6 relied upon the terms of its Interconnection Agreement with XO. As previously 7 noted, the Interconnection Agreement contains no provisions allowing for 8 conversions such as those requested by XO. To the contrary, those terms call for 9 the parties to negotiate changes in law such as this new conversion requirement 10 prior to incorporating them into the Interconnection Agreement and specifically states that changes to the Agreement cannot be made without an amendment. 9 1 12 Section 16.2 of the General Terms & Conditions of the Interconnection 13 Agreement states: "No modification, amendment, supplement to, or waiver of the 14 Agreement or any of its provisions shall be effective and binding upon the Parties unless it is made in writing and duly signed by the Parties." In other words, 15 16 neither party is entitled to the benefits of a change in law until an amendment to 17 their Interconnection Agreement has been executed. BellSouth should not be held 18 liable for a change to its Interconnection Agreement not made in writing at least 19 until the point that the Commission itself clearly overrides the terms of the 20 Agreement between the parties. 21 22 IF THE COMMISSION DECIDES THAT XO IS ENTITLED TO BILLING Q. CREDITS, WHAT WOULD THE AMOUNT OF THE CREDIT BE? 23 24

1.00 A. The amount of the credit would vary depending on which circuits the 2 Commission decides are eligible for conversion under XO's request as well as the 3 date the Commission decides to use to determine a true-up. Exhibit SWP-8 shows 1 the difference in billing for each month for the standalone loops shown in Exhibit 5 SWP-1 since the date XO first requested each circuit as well as the total since the 6 date of first request and since the effective date of the TRO. Exhibit SWP-9 is similar but shows the difference in billing for the loop portion of the commingled circuits terminating in collocations as identified in Exhibit SWP-2. 8 9 10 Q. WHY AREN'T THERE EXHIBITS FOR THE BILLING DIFFERENCE FOR 1 6 CIRCUITS LISTED IN EXHIBITS SWP-3 THROUGH SWP-6? 12 13 A. As previously explained, Exhibit SWP-3 shows circuits that do not terminate at a 14 collocation arrangement. Since these circuits are EELs, they must comply with 15 the service eligibility criteria, which requires collocation. Under the FCC's rules, 16 no part of these circuits can be converted to UNEs. 17 18 Exhibits SWP-4 and SWP-5 list circuits for which there is no loop element and 19 there is no conversion to UNE loop possible. Exhibit SWP-6 shows circuits that 20 billed as UNEs so no billing credit is due under any circumstances. 21 22 DOES THIS CONCLUDE YOUR TESTIMONY? Q. 23 24 A. Yes.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-1
Page 1 of 9

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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-1
Page 2 of 9

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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-1
Page 3 of 9

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Bell South Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-1

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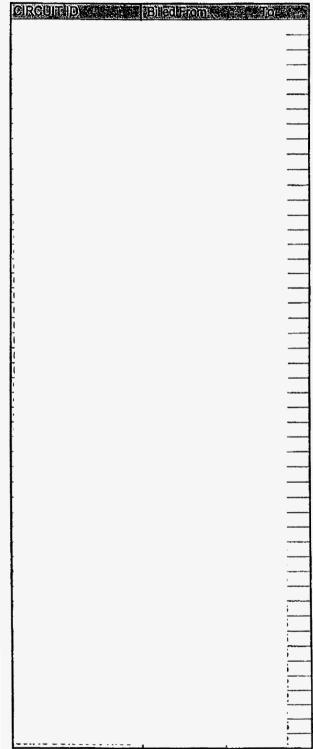
BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-1
Page 5 of 9

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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-1
Page 6 of 9



BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-1 Page 7 of 9



BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-1 Page 8 of 9

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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-1
Page 9 of 9

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-2
Page 1 of 2

Commingled EELs

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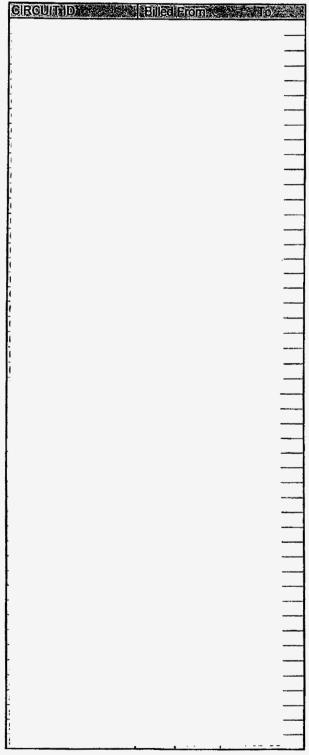
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Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-2
Page 2 of 2

Commingled EELs

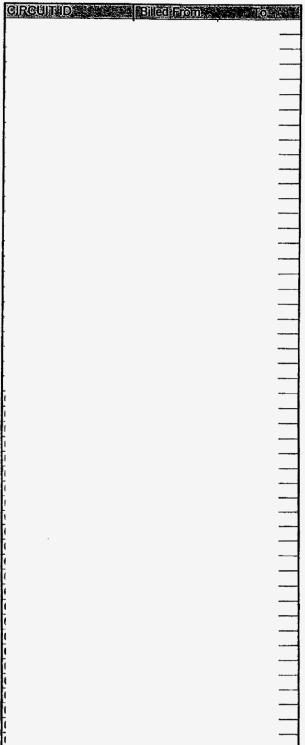
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BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-3 Page 1 of 7

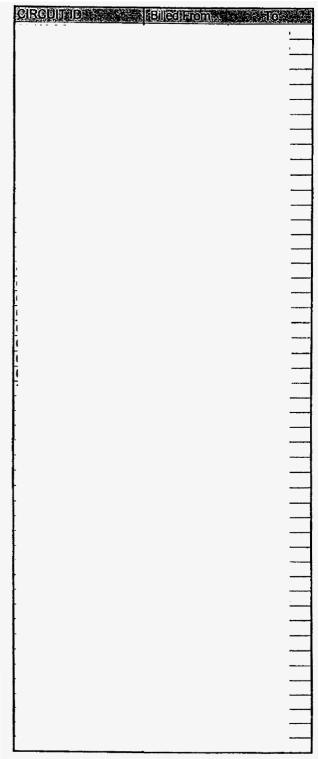


Bell South Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-3
Page 2 of 7

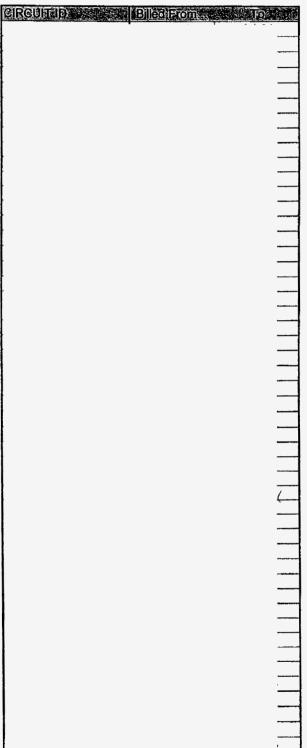


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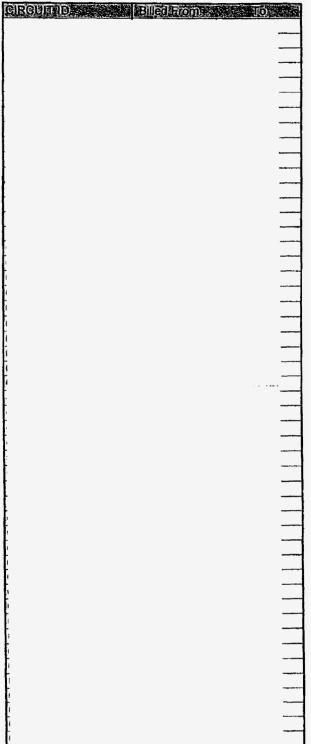
BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-3
Page 3 of 7



BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-3
Page 4 of 7

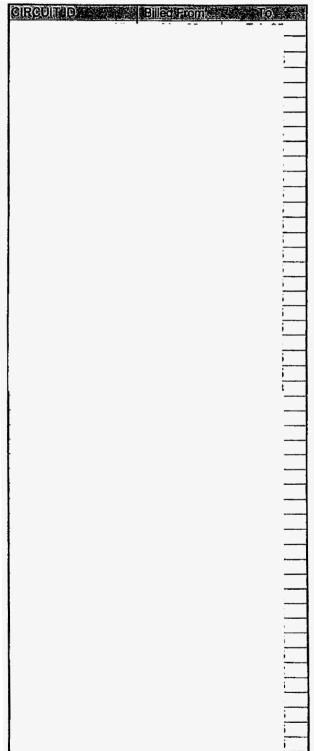


BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-3 Page 5 of 7



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BeltSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-3
Page 6 of 7



BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-3 Page 7 of 7

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Local Channels

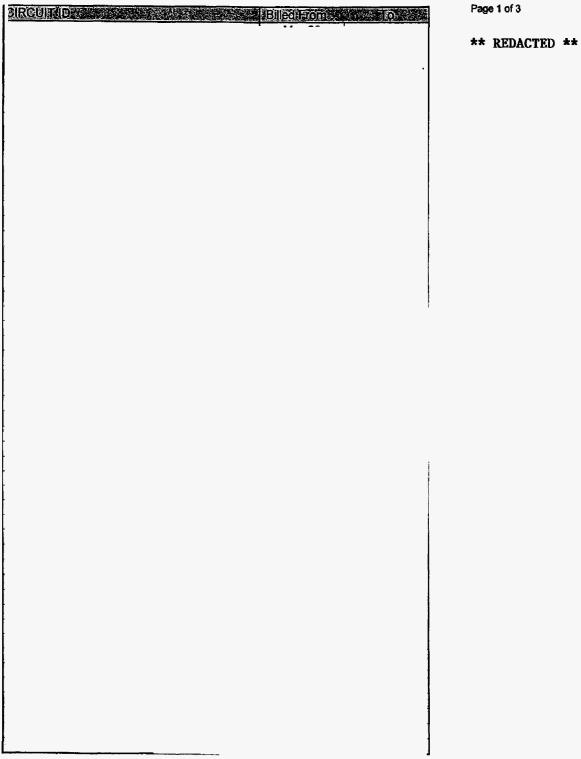
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Exhibit SWP-4
Page 1 of 1

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Circuits with No Loop

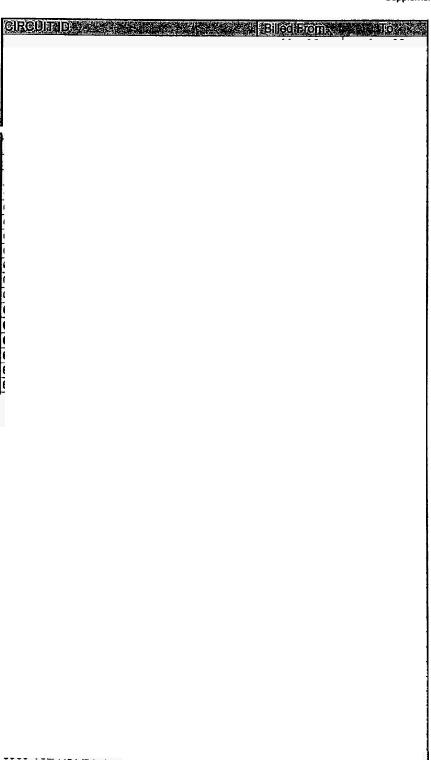
BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-5



Circuits with No Loop

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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-5
Page 2 of 3



Circuits with No Loop

BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-5

Page 3 of 3



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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-6
Page 1 of 1

CIRCULTION BILLETIANT TO

SPA TO SNESAI Service Request

CLEC: •	DATE:			f			
STATE: *	CCNA:*	CC:*					
INT:*	INT TEL:	FAX or EMAIL:*	 				
Proj MGR:	PM TEL:	SR:	SR TEL:				
Project ID:	BSC:		1	Circuit Cour	rt:		

*C! F		TO F	 •

ACTL*	CFA*	POPSWC*	SCFA*	SecLoc/EU SWC*	EXIST BAN*	PON*	RPON*	EXIST CKT ID*	NEW BAN*	NEW CKT ID	C1-ord	C2-ord	BST DD	RMKS
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BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-7 Page 2 of 3

Self-Certification and Local Conversion Request SPA to EEL

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Required Fields	Description									
CLEC	Competitive Local Exchange Customer Name									
DATE	Date CLEC sends conversion request to BellSouth									
	The state in which the cicuits to be converted are located. One									
STATE	request per State per service level.									
CCNA	Common Carrier Name									
CC	CLEC's 4 digit company code									
NT Name	CLEC Initiator's Name									
NT Tel	CLEC Initiator's Telephone Number									
Fax or email	CLEC Initiator's FAX or Email Address									
	The Project Identification assigned by LCSC Project Manager for									
Project ID	tracking service orders.									
Project Manager	LCSC Project Manager's Name									
PM Tel	LCSC Project Manager's Telephone Number									
Circuit Count	Total number of circuits on request (Optional)									
	LCSC will determine UNE specific class of service based on circuit									
BCS	design.									
	an 11 character CLLI represents the ORIGINATING Location or									
ACTL/POP	POP of the circuit. Always applicable.									
	Identifies the CLEC's Collocated Connecting Facility Assignment for									
	the ORIGINATING Location. CFA always required for circuits									
CFA	originating as interoffice or Local Loops.									
	The BST serving wire center of the ORIGINATING Location point of									
POP SWC	the circuit. Always applicable.									
	the TERMINATING Location. SCFA always required for circuits									
	The BST serving wire center of the TERMINATING Location.									
SecLoc/EU SWC	Always applicable.									
	The existing Carrier Access Billed Account Number. Only the 10 digit									
Existing BAN	account number required. Ex: 404N101111									
PON	CLEC's Purchase Order Number									
RPON	CLEC's Related Purchase Order Number									
	New Billing Account Number (Optional) CLEC may request NEW if									
New BAN	desired. Refer to Account Team for details.									
	Circuit Identifier of existing circuit. CLEC MUST provide. The BOC									
Exist ECCKT	format required is for CLS, ex: ##.HCFS.123456SB									
	Total Todal of to to oboj en militar of 125 forms									
New ECCKT	CLS format with a UNE modifier.									
	Due Date of individual ECCKT conversion. LCSC									
	Project manager will assign.									
เลอรากก										
BST DD	1Change ander number to remove CDA									
C1-Order	Change order number to remove SPA									
	Change order number to remove SPA Change order number to add UNE Miscellaneous remarks to circuit or order status.									

BellSouth Telecommunications, Inc.
Plorida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-7
Page 3 of 3

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CLEC REQUIRED PIELDS												
												Project ID:
				SATEL:			HATEL:					
						FAX of EMAIL:		*:Jat 1Ni		.: INI		
										ೆ ೧೦	CCNV	*:3TATE
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						for conversion	ABJ XIMA	us TSUN	anolanevnos	thorized for	Resale circuits au	Vietañ T28**
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Billing Difference for Standalone Loops

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Supplemental Direct Testimony
Exhibit SWP-8
Page 1 of 1



Billing Difference for Commingled EELs

BellSouth Telecommunications, Inc. Florida Public Service Commission Docket No. 041114-TP Supplemental Direct Testimony Exhibit SWP-9

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