

Timolyn Henry

ORIGINAL

From: Barclay, Lynn [Lynn.Barclay@BellSouth.com]
Sent: Thursday, October 19, 2006 3:10 PM
To: Filings@psc.state.fl.us
Cc: Fatool, Vicki; Randa, Johna A; Nancy Sims; Holland, Robyn P; Bixler, Micheale; Slaughter, Brenda; Culpepper, Robert
Subject: 000121A-TP BellSouth's Response to Staff's Follow-up Questions
Attachments: 000121A-TP Responses to Staff.pdf

- A. Lynn Barclay
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
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- B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Incumbent Local Exchange Telecommunications Companies.
- C. BellSouth Telecommunications, Inc.
 on behalf of Robert A. Culpepper
- D. 29 pages total (includes Bayó letter, certificate of service, Responses and attachments)
- E. BellSouth's Telecommunications, Inc.'s Responses to Staff's Follow-up Questions from the October 11, 2006 Conference Call Action Items.

<<000121A-TP Responses to Staff.pdf>>

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CMP *****

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Senior Regulatory Counsel

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October 19, 2006

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
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. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Responses to Staff's Follow-up Questions from the October 11, 2006 Conference Call. A copy of the same is being provided to all parties of record.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix
James Meza, III

654253

DOCUMENT NUMBER-DATE

09643 OCT 19 06

FPSC-COMMISSION CLERK

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 19th day of October, 2006 to the following:

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Robert A. Cupepper

**(+) Signed Protective
Agreement**

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to Staff's Follow-up Questions
From October 11, 2006 Conference Call
Filing Date: October 19, 2006
Item No. 1
Page 1 of 1

Request: For OSS-1, please provide revised language for BellSouth's proposed exclusion to disallow bundled transactions that results in excessive volumes. The revised language regarding excessive volume should specifically be linked to BellSouth's Volume Guidelines and the CLEC forecast.

Response: BellSouth's proposed revised language regarding the exclusion of CLEC transactions from measure OSS-1 and PO-2 due to excessive volume is provided below:

- **Transactions that are not submitted in accordance with the OSS Interconnection Volume Guidelines, and/or exceed a CLEC's annual or peak hourly volume forecasts**

In addition, for the PO-2 measure, the following additional exclusion would apply:

- **Volumes that exceed the limitations established by the BellSouth Loop Makeup (LMU) CLEC Information Package (e.g., during any hour the system is available, no more than ten (10) LMU requests shall be submitted to a single wire center within a one (1) hour period)**

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to Staff's Follow-up Questions
From October 11, 2006 Conference Call
Filing Date: October 19, 2006
Item No. 2
Page 1 of 1

Request: For OSS-1, please explain why an additional two seconds would be needed for CLEC TAFI for parity comparison purposes.

Response:

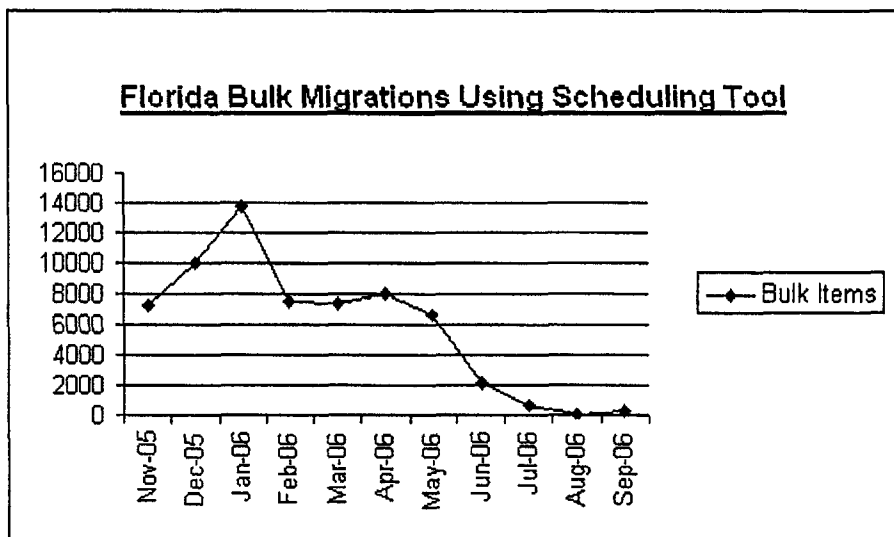
The authorization/validation rules for access to customer information are based on the principle that TAFI recognizes the user (BST or CLEC) by a profile for each user stored in the system. This validation step is performed such that each user is allowed access only to records that they are permitted to view. BST users are allowed to view all records for maintenance activities while each CLEC user may only access records for circuits that they 'own'. The "validation step" is a process conducted within TAFI using the data obtained from CRIS (Customer Records Information System) or LMOS-DLR (Loop Maintenance Operations System - Detailed Line Record available on the LMOS host system). CLEC ownership is determined by matching the OCN value on the individual circuit against an 'allowed list' for the given CLEC user stored in TAFI. The OCN value is embedded in the Major Account Number (MAN) found in the CRIS CSR "Bill To" section.

However, for SL1 UNE loops, troubles are entered into TAFI using a circuit identification number and the CRIS record cannot be accessed using the circuit identification number. The authorization/validation step for SL1 UNE loops requires TAFI to use LMOS DLR to obtain the MAN number. This additional step adds time to the overall response interval as transactions accessing LMOS DLR tend to take longer than transactions accessing CRIS..

Request: For PO-3, please provide BellSouth's business plan for removing UNE Migration Batch Scheduler as a BellSouth interface for CLECs.

Response: The UNE Bulk Migration Scheduler was put in place to accommodate the anticipated high volumes associated with conversions from UNE-P to UNE Loops as a result of the FCC's TRRO. As such, these are the only transactions that have been captured by measure PO-3. Thus, as these conversions draw to a close, there would simply be no volume reported. The chart below shows the declining volumes for the period November 2005 – September 2006.

Month	Lines
November	7286
December	9945
January	13751
February	7533
March	7368
April	7942
May	6638
June	2138
July	674
August	48
September	246



Based on the declining need for the UNE Bulk Scheduler associated with large numbers of bulk migration, BellSouth's business plan would include only limited use of the Batch Scheduler, if any. Thus, BellSouth believes that applying a benchmark to a measure that would have at most limited use is unnecessary. If the measure is retained it should be retained for diagnostic purposes only, i.e., no performance standard applies.

Request: For O-8, please provide an analysis of the impact to SQM and SEEM data if the change in the standard for non-mech orders were changed to 18 hours. The proposed standards should be applied to at least six months of historical SQM and SEEM data, and include the impact to Tier 1 and 2.

Response: The following table provides an illustration of the impact to the SQM and SEEM if the 18 hour reject interval requirement for Non-Mechanized LSRs had been in place for the period January – July 2006. These results assume that no changes were made in the staffing level that was in place during this period to accommodate the shorter interval. The approach taken to approximate the incremental SEEM liability is the same as that used in providing responses to Action Items 4 and 5 in BellSouth's September 29, 2006 filing. That is, the fail month count is assumed to be one (i.e., Month 1 fee amount). If a fail month count of six is used instead, the SEEM liabilities would be significantly more. The potential SEEM liabilities would range from about \$18,230 to \$41,018. The chart below reflects the low end of the range. The SEEM amounts provided below are all Tier 1. No Tier 2 liabilities were generated.

Measure O-8: Reject Interval, Non-Mechanized					
Month	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric	SEEM Liability
January	95% <= 18 Hours	1115	1537	72.54%	\$14,950
February	95% <= 18 Hours	1687	1722	97.97%	\$30
March	95% <= 18 Hours	2513	2609	96.32%	\$270
April	95% <= 18 Hours	1373	1417	96.89%	\$120
May	95% <= 18 Hours	1584	1626	97.42%	\$180
June	95% <= 18 Hours	1315	1340	98.13%	\$30
July	95% <= 18 Hours	1331	1468	90.67%	\$2,650
Total		10918	11719	93.16%	\$18,230

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to Staff's Follow-up Questions
From October 11, 2006 Conference Call
Filing Date: October 19, 2006
Item No. 5
Page 1 of 2

Request: For O-9, please provide an analysis of the impact to SQM and SEEM data if the change in standards for fully-mech and non-mech orders were changed to two hours and 18 hours, respectively. The proposed standards should be applied to at least six months of historical SQM and SEEM data, and include the impact to Tier 1 and 2. Also include the results if current disaggregation was modified to Resale, UNE, and Trunks. Please provide volumes in each category of mechanization for these product classes.

Response: The impact of the changes to the SQM results for FOC Timeliness, if the fully mechanized interval is changed to 2 hours and the non-mechanized interval is changed to 18 hours, for the period January to July 2006, is provided in Attachment 1 and Attachment 2. These results assume that no changes were made in the staffing level that was in place during this period to accommodate the shorter intervals. The results in Attachment 1 are based on the product disaggregation currently in the SQM. The results in Attachment 2 are based on a modified product disaggregation of Resale, UNE and Local Interconnection Trunks. Please note that the interval for Local Interconnection Trunks is currently 5 business days, and BellSouth did not understand Staff's request to include a change to this interval. Therefore, no data for Local Interconnection Trunks are included.

With respect to SEEM, the approach taken to approximate the incremental SEEM liability is the same as that used in providing responses to action items 4 and 5 in BellSouth's September 29, 2006 filing. That is, the fail month count is assumed to be one (i.e., Month 1 fee amount). If a fail month count of six is used instead, the SEEM liabilities would be significantly more. The potential SEEM liabilities would range from about \$308,710 to \$694,598 with the current product disaggregation; with the modified disaggregation of Resale, UNE and Local Interconnection Trunks, potential SEEM liabilities would range from about \$279,530 to \$628,943.

Chart A below provides the incremental impact based on low end of the potential SEEM range if the intervals for FOC Fully Mechanized and Non-Mechanized are changed to 2 hours and 18 hours respectively, and the current disaggregation is maintained.

CHART A

<u>Month</u>	<u>Fully Mechanized</u>		<u>Non-Mechanized</u>	
	<u>Tier 1</u>	<u>Tier 2</u>	<u>Tier 1</u>	<u>Tier 2</u>
January	\$ 500	\$ -	\$40,700	\$ -
February	\$ 5,650	\$ -	\$11,250	\$ -
March	\$30,330	\$ -	\$ 8,150	\$25,020
April	\$42,090	\$ -	\$ 2,550	\$ -
May	\$ 30	\$ -	\$ 3,150	\$ -
June	\$ 750	\$ -	\$14,250	\$ -
July	\$ 720	\$ -	\$82,950	\$40,620
Total	\$80,070	\$ -	\$163,000	\$65,640

Chart B below provides the incremental impact based on low end of the potential SEEM range if the intervals for FOC Fully Mechanized and Non-Mechanized are changed to 2 hours and 18 hours respectively, and the disaggregation is modified to Resale, UNE and Local Interconnection Trunks.

CHART B

<u>Month</u>	<u>Fully Mechanized</u>		<u>Non-Mechanized</u>	
	<u>Tier 1</u>	<u>Tier 2</u>	<u>Tier 1</u>	<u>Tier 2</u>
January	\$ 500	\$ -	\$39,500	\$ -
February	\$ 3,450	\$ -	\$10,050	\$ -
March	\$ 3,510	\$ -	\$ 6,000	\$22,500
April	\$57,060	\$ -	\$ 2,350	\$ 4,200
May	\$ 30	\$ -	\$ 5,250	\$ 4,140
June	\$ 840	\$ -	\$13,960	\$ 8,280
July	\$ 870	\$ -	\$81,500	\$15,540
Total	\$66,260	\$ -	\$158,610	\$54,660

Measure O-9: FOC Timeliness – Current Disaggregation						
Month	Product	Product Group Description	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Jan-06	LNP (Standalone)	Fully Mechanized	95% <= 2 Hours	7759	7827	99.13%
Jan-06	Resale Business	Fully Mechanized	95% <= 2 Hours	1234	1242	99.36%
Jan-06	Resale Residence	Fully Mechanized	95% <= 2 Hours	25615	25646	99.88%
Jan-06	UNE Analog Loop	Fully Mechanized	95% <= 2 Hours	8252	8416	98.05%
Jan-06	UNE Analog Loop w/LNP	Fully Mechanized	95% <= 2 Hours	9236	10096	91.48%
Jan-06	UNE Digital Loop >= DS1	Fully Mechanized	95% <= 2 Hours	613	627	97.77%
Jan-06	UNE EELs	Fully Mechanized	95% <= 2 Hours	18	18	100.00%
Jan-06	UNE ISDN	Fully Mechanized	95% <= 2 Hours	371	381	97.38%
Jan-06	UNE Line Splitting/Sharing	Fully Mechanized	95% <= 2 Hours	624	635	98.27%
Jan-06	UNE Loop + Port Combos	Fully Mechanized	95% <= 2 Hours	21976	22013	99.83%
Jan-06	UNE Other	Fully Mechanized	95% <= 2 Hours	20486	20541	99.73%
Jan-06	UNE xDSL	Fully Mechanized	95% <= 2 Hours	385	385	100.00%
Feb-06	LNP (Standalone)	Fully Mechanized	95% <= 2 Hours	8233	8234	99.99%
Feb-06	Resale Business	Fully Mechanized	95% <= 2 Hours	898	910	98.68%
Feb-06	Resale Residence	Fully Mechanized	95% <= 2 Hours	14666	14690	99.84%
Feb-06	UNE Analog Loop	Fully Mechanized	95% <= 2 Hours	6002	6091	98.54%
Feb-06	UNE Analog Loop w/LNP	Fully Mechanized	95% <= 2 Hours	3762	4565	82.41%
Feb-06	UNE Digital Loop >= DS1	Fully Mechanized	95% <= 2 Hours	605	618	97.90%
Feb-06	UNE EELs	Fully Mechanized	95% <= 2 Hours	5	5	100.00%
Feb-06	UNE ISDN	Fully Mechanized	95% <= 2 Hours	314	318	98.74%
Feb-06	UNE Line Splitting/Sharing	Fully Mechanized	95% <= 2 Hours	471	476	98.95%
Feb-06	UNE Loop + Port Combos	Fully Mechanized	95% <= 2 Hours	12911	12933	99.83%
Feb-06	UNE Other	Fully Mechanized	95% <= 2 Hours	16806	16889	99.51%
Feb-06	UNE xDSL	Fully Mechanized	95% <= 2 Hours	373	375	99.47%
Mar-06	LNP (Standalone)	Fully Mechanized	95% <= 2 Hours	8900	8903	99.97%
Mar-06	Resale Business	Fully Mechanized	95% <= 2 Hours	1233	1242	99.28%
Mar-06	Resale Residence	Fully Mechanized	95% <= 2 Hours	23302	23637	98.58%
Mar-06	UNE Analog Loop	Fully Mechanized	95% <= 2 Hours	5961	6025	98.94%
Mar-06	UNE Analog Loop w/LNP	Fully Mechanized	95% <= 2 Hours	5421	7715	70.27%
Mar-06	UNE Digital Loop >= DS1	Fully Mechanized	95% <= 2 Hours	699	706	99.01%
Mar-06	UNE EELs	Fully Mechanized	95% <= 2 Hours	230	231	99.57%
Mar-06	UNE ISDN	Fully Mechanized	95% <= 2 Hours	319	323	98.76%
Mar-06	UNE Line Splitting/Sharing	Fully Mechanized	95% <= 2 Hours	504	508	99.21%
Mar-06	UNE Loop + Port Combos	Fully Mechanized	95% <= 2 Hours	15705	15735	99.81%
Mar-06	UNE Other	Fully Mechanized	95% <= 2 Hours	18857	19074	98.86%
Mar-06	UNE xDSL	Fully Mechanized	95% <= 2 Hours	340	340	100.00%
Apr-06	LNP (Standalone)	Fully Mechanized	95% <= 2 Hours	7671	7672	99.99%
Apr-06	Resale Business	Fully Mechanized	95% <= 2 Hours	968	984	98.37%
Apr-06	Resale Residence	Fully Mechanized	95% <= 2 Hours	20284	20416	99.35%
Apr-06	UNE Analog Loop	Fully Mechanized	95% <= 2 Hours	7482	7558	98.99%
Apr-06	UNE Analog Loop w/LNP	Fully Mechanized	95% <= 2 Hours	7783	10786	72.16%
Apr-06	UNE Digital Loop >= DS1	Fully Mechanized	95% <= 2 Hours	668	674	99.11%
Apr-06	UNE EELs	Fully Mechanized	95% <= 2 Hours	205	205	100.00%
Apr-06	UNE ISDN	Fully Mechanized	95% <= 2 Hours	298	303	98.35%

Measure O-9: FOC Timeliness – Current Disaggregation						
Month	Product	Product Group Description	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Apr-06	UNE Line Splitting/Sharing	Fully Mechanized	95% <= 2 Hours	521	529	98.49%
Apr-06	UNE Loop + Port Combos	Fully Mechanized	95% <= 2 Hours	3590	3614	99.34%
Apr-06	UNE Other	Fully Mechanized	95% <= 2 Hours	18712	18803	99.52%
Apr-06	UNE xDSL	Fully Mechanized	95% <= 2 Hours	286	286	100.00%
May-06	LNP (Standalone)	Fully Mechanized	95% <= 2 Hours	8129	8219	98.90%
May-06	Resale Business	Fully Mechanized	95% <= 2 Hours	2148	2159	99.49%
May-06	Resale Residence	Fully Mechanized	95% <= 2 Hours	49737	49780	99.91%
May-06	UNE Analog Loop	Fully Mechanized	95% <= 2 Hours	8436	8509	99.14%
May-06	UNE Analog Loop w/LNP	Fully Mechanized	95% <= 2 Hours	2186	2991	73.09%
May-06	UNE Digital Loop >= DS1	Fully Mechanized	95% <= 2 Hours	1102	1119	98.48%
May-06	UNE EELs	Fully Mechanized	95% <= 2 Hours	211	211	100.00%
May-06	UNE ISDN	Fully Mechanized	95% <= 2 Hours	458	467	98.07%
May-06	UNE Line Splitting/Sharing	Fully Mechanized	95% <= 2 Hours	456	464	98.28%
May-06	UNE Loop + Port Combos	Fully Mechanized	95% <= 2 Hours	3696	3703	99.81%
May-06	UNE Other	Fully Mechanized	95% <= 2 Hours	21186	21188	99.99%
May-06	UNE xDSL	Fully Mechanized	95% <= 2 Hours	1114	1125	99.02%
Jun-06	LNP (Standalone)	Fully Mechanized	95% <= 2 Hours	8668	8671	99.97%
Jun-06	Resale Business	Fully Mechanized	95% <= 2 Hours	967	973	99.38%
Jun-06	Resale Residence	Fully Mechanized	95% <= 2 Hours	18670	18711	99.78%
Jun-06	UNE Analog Loop	Fully Mechanized	95% <= 2 Hours	7082	7212	98.20%
Jun-06	UNE Analog Loop w/LNP	Fully Mechanized	95% <= 2 Hours	2236	2782	80.37%
Jun-06	UNE Digital Loop >= DS1	Fully Mechanized	95% <= 2 Hours	740	764	96.86%
Jun-06	UNE EELs	Fully Mechanized	95% <= 2 Hours	195	197	98.98%
Jun-06	UNE ISDN	Fully Mechanized	95% <= 2 Hours	364	366	99.45%
Jun-06	UNE Line Splitting/Sharing	Fully Mechanized	95% <= 2 Hours	414	415	99.76%
Jun-06	UNE Loop + Port Combos	Fully Mechanized	95% <= 2 Hours	2076	2077	99.95%
Jun-06	UNE Other	Fully Mechanized	95% <= 2 Hours	22767	22769	99.99%
Jun-06	UNE xDSL	Fully Mechanized	95% <= 2 Hours	804	807	99.63%
Jul-06	LNP (Standalone)	Fully Mechanized	95% <= 2 Hours	8144	8144	100.00%
Jul-06	Resale Business	Fully Mechanized	95% <= 2 Hours	677	684	98.98%
Jul-06	Resale Residence	Fully Mechanized	95% <= 2 Hours	17951	18023	99.60%
Jul-06	UNE Analog Loop	Fully Mechanized	95% <= 2 Hours	5565	5969	93.23%
Jul-06	UNE Analog Loop w/LNP	Fully Mechanized	95% <= 2 Hours	1246	1517	82.14%
Jul-06	UNE Digital Loop >= DS1	Fully Mechanized	95% <= 2 Hours	577	595	96.97%
Jul-06	UNE EELs	Fully Mechanized	95% <= 2 Hours	126	129	97.67%
Jul-06	UNE ISDN	Fully Mechanized	95% <= 2 Hours	332	339	97.94%
Jul-06	UNE Line Splitting/Sharing	Fully Mechanized	95% <= 2 Hours	660	664	99.40%
Jul-06	UNE Loop + Port Combos	Fully Mechanized	95% <= 2 Hours	1488	1497	99.40%
Jul-06	UNE Other	Fully Mechanized	95% <= 2 Hours	19880	19882	99.99%
Jul-06	UNE xDSL	Fully Mechanized	95% <= 2 Hours	564	564	100.00%
Jan-06	LNP (Standalone)	Non-Mechanized	95% <= 18 Hours	105	148	70.95%
Jan-06	Resale Business	Non-Mechanized	95% <= 18 Hours	69	95	72.63%
Jan-06	Resale Design	Non-Mechanized	95% <= 18 Hours	0	1	0.00%
Jan-06	Resale Residence	Non-Mechanized	95% <= 18 Hours	936	1351	69.28%
Jan-06	Une analog Loop	Non-Mechanized	95% <= 18 Hours	477	748	63.77%

Measure O-9: FOC Timeliness – Current Disaggregation						
Month	Product	Product Group Description	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Jan-06	Une Analog Loop w/LNP	Non-Mechanized	95% <= 18 Hours	16	20	80.00%
Jan-06	Une Digital Loop >= DS1	Non-Mechanized	95% <= 18 Hours	161	220	73.18%
Jan-06	UNE EELs	Non-Mechanized	95% <= 18 Hours	310	399	77.69%
Jan-06	UNE ISDN	Non-Mechanized	95% <= 18 Hours	10	19	52.63%
Jan-06	UNE Line Splitting/Sharing	Non-Mechanized	95% <= 18 Hours	6	8	75.00%
Jan-06	UNE Loop + Port Combos	Non-Mechanized	95% <= 18 Hours	62	89	69.66%
Jan-06	UNE Other	Non-Mechanized	95% <= 18 Hours	207	254	81.50%
Jan-06	UNE xDSL	Non-Mechanized	95% <= 18 Hours	43	51	84.31%
Feb-06	LNP (Standalone)	Non-Mechanized	95% <= 18 Hours	151	154	98.05%
Feb-06	Resale Business	Non-Mechanized	95% <= 18 Hours	90	99	90.91%
Feb-06	Resale Design	Non-Mechanized	95% <= 18 Hours	3	5	60.00%
Feb-06	Resale Residence	Non-Mechanized	95% <= 18 Hours	806	954	84.49%
Feb-06	Une analog Loop	Non-Mechanized	95% <= 18 Hours	592	704	84.09%
Feb-06	Une Analog Loop w/LNP	Non-Mechanized	95% <= 18 Hours	21	22	95.45%
Feb-06	Une Digital Loop >= DS1	Non-Mechanized	95% <= 18 Hours	230	254	90.55%
Feb-06	UNE EELs	Non-Mechanized	95% <= 18 Hours	374	402	93.03%
Feb-06	UNE ISDN	Non-Mechanized	95% <= 18 Hours	18	18	100.00%
Feb-06	UNE Line Splitting/Sharing	Non-Mechanized	95% <= 18 Hours	3	4	75.00%
Feb-06	UNE Loop + Port Combos	Non-Mechanized	95% <= 18 Hours	120	129	93.02%
Feb-06	UNE Other	Non-Mechanized	95% <= 18 Hours	295	304	97.04%
Feb-06	UNE xDSL	Non-Mechanized	95% <= 18 Hours	53	58	91.38%
Mar-06	LNP (Standalone)	Non-Mechanized	95% <= 18 Hours	152	159	95.60%
Mar-06	Resale Business	Non-Mechanized	95% <= 18 Hours	105	110	95.45%
Mar-06	Resale Design	Non-Mechanized	95% <= 18 Hours	-	-	-
Mar-06	Resale Residence	Non-Mechanized	95% <= 18 Hours	2714	2881	94.20%
Mar-06	Une Analog Loop	Non-Mechanized	95% <= 18 Hours	794	890	89.21%
Mar-06	Une Analog Loop w/LNP	Non-Mechanized	95% <= 18 Hours	24	24	100.00%
Mar-06	Une Digital Loop >= DS1	Non-Mechanized	95% <= 18 Hours	291	335	86.87%
Mar-06	UNE EELs	Non-Mechanized	95% <= 18 Hours	431	461	93.49%
Mar-06	UNE ISDN	Non-Mechanized	95% <= 18 Hours	29	33	87.88%
Mar-06	UNE Line Splitting/Sharing	Non-Mechanized	95% <= 18 Hours	4	5	80.00%
Mar-06	UNE Loop + Port Combos	Non-Mechanized	95% <= 18 Hours	97	99	97.98%
Mar-06	UNE Other	Non-Mechanized	95% <= 18 Hours	369	384	96.09%
Mar-06	UNE xDSL	Non-Mechanized	95% <= 18 Hours	57	58	98.28%
Apr-06	LNP (Standalone)	Non-Mechanized	95% <= 18 Hours	143	153	93.46%
Apr-06	Resale Business	Non-Mechanized	95% <= 18 Hours	84	88	95.45%
Apr-06	Resale Design	Non-Mechanized	95% <= 18 Hours	-	-	-
Apr-06	Resale Residence	Non-Mechanized	95% <= 18 Hours	1744	1784	97.76%
Apr-06	Une Analog Loop	Non-Mechanized	95% <= 18 Hours	673	758	88.79%
Apr-06	Une Analog Loop w/LNP	Non-Mechanized	95% <= 18 Hours	11	13	84.62%
Apr-06	Une Digital Loop >= DS1	Non-Mechanized	95% <= 18 Hours	263	276	95.29%
Apr-06	UNE EELs	Non-Mechanized	95% <= 18 Hours	319	338	94.38%
Apr-06	UNE ISDN	Non-Mechanized	95% <= 18 Hours	19	23	82.61%
Apr-06	UNE Line Splitting/Sharing	Non-Mechanized	95% <= 18 Hours	1	1	100.00%
Apr-06	UNE Loop + Port Combos	Non-Mechanized	95% <= 18 Hours	27	29	93.10%

Measure O-9: FOC Timeliness – Current Disaggregation						
Month	Product	Product Group Description	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Apr-06	UNE Other	Non-Mechanized	95% <= 18 Hours	331	334	99.10%
Apr-06	UNE xDSL	Non-Mechanized	95% <= 18 Hours	41	42	97.62%
May-06	LNP (Standalone)	Non-Mechanized	95% <= 18 Hours	148	154	96.10%
May-06	Resale Business	Non-Mechanized	95% <= 18 Hours	95	100	95.00%
May-06	Resale Design	Non-Mechanized	95% <= 18 Hours	2	2	100.00%
May-06	Resale Residence	Non-Mechanized	95% <= 18 Hours	1851	1873	98.83%
May-06	Une Analog Loop	Non-Mechanized	95% <= 18 Hours	925	1063	87.02%
May-06	Une Analog Loop w/LNP	Non-Mechanized	95% <= 18 Hours	32	44	72.73%
May-06	Une Digital Loop >= DS1	Non-Mechanized	95% <= 18 Hours	320	346	92.49%
May-06	UNE EELs	Non-Mechanized	95% <= 18 Hours	324	345	93.91%
May-06	UNE ISDN	Non-Mechanized	95% <= 18 Hours	23	25	92.00%
May-06	UNE Line Splitting/Sharing	Non-Mechanized	95% <= 18 Hours	4	4	100.00%
May-06	UNE Loop + Port Combos	Non-Mechanized	95% <= 18 Hours	35	38	92.11%
May-06	UNE Other	Non-Mechanized	95% <= 18 Hours	565	578	97.75%
May-06	UNE xDSL	Non-Mechanized	95% <= 18 Hours	64	65	98.46%
Jun-06	LNP (Standalone)	Non-Mechanized	95% <= 18 Hours	127	128	99.22%
Jun-06	Resale Business	Non-Mechanized	95% <= 18 Hours	51	56	91.07%
Jun-06	Resale Design	Non-Mechanized	95% <= 18 Hours	4	4	100.00%
Jun-06	Resale Residence	Non-Mechanized	95% <= 18 Hours	815	843	96.68%
Jun-06	Une Analog Loop	Non-Mechanized	95% <= 18 Hours	317	448	70.76%
Jun-06	Une Analog Loop w/LNP	Non-Mechanized	95% <= 18 Hours	72	86	83.72%
Jun-06	Une Digital Loop >= DS1	Non-Mechanized	95% <= 18 Hours	127	189	67.20%
Jun-06	UNE EELs	Non-Mechanized	95% <= 18 Hours	154	286	53.85%
Jun-06	UNE ISDN	Non-Mechanized	95% <= 18 Hours	11	20	55.00%
Jun-06	UNE Line Splitting/Sharing	Non-Mechanized	95% <= 18 Hours	0	1	0.00%
Jun-06	UNE Loop + Port Combos	Non-Mechanized	95% <= 18 Hours	10	11	90.91%
Jun-06	UNE Other	Non-Mechanized	95% <= 18 Hours	245	252	97.22%
Jun-06	UNE xDSL	Non-Mechanized	95% <= 18 Hours	57	59	96.61%
Jul-06	LNP (Standalone)	Non-Mechanized	95% <= 18 Hours	91	95	95.79%
Jul-06	Resale Business	Non-Mechanized	95% <= 18 Hours	51	106	48.11%
Jul-06	Resale Design	Non-Mechanized	95% <= 18 Hours	1	1	100.00%
Jul-06	Resale Residence	Non-Mechanized	95% <= 18 Hours	1077	2401	44.86%
Jul-06	Une Analog Loop	Non-Mechanized	95% <= 18 Hours	983	1299	75.67%
Jul-06	Une Analog Loop w/LNP	Non-Mechanized	95% <= 18 Hours	9	9	100.00%
Jul-06	Une Digital Loop >= DS1	Non-Mechanized	95% <= 18 Hours	236	311	75.88%
Jul-06	UNE EELs	Non-Mechanized	95% <= 18 Hours	365	476	76.68%
Jul-06	UNE ISDN	Non-Mechanized	95% <= 18 Hours	25	32	78.13%
Jul-06	UNE Line Splitting/Sharing	Non-Mechanized	95% <= 18 Hours	1	2	50.00%
Jul-06	UNE Loop + Port Combos	Non-Mechanized	95% <= 18 Hours	8	12	66.67%
Jul-06	UNE Other	Non-Mechanized	95% <= 18 Hours	265	276	96.01%
Jul-06	UNE xDSL	Non-Mechanized	95% <= 18 Hours	51	54	94.44%

Measure O-9: FOC Timeliness - Resale and UNE						
Month	Product	Product Group Description	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Jan-06	Resale	Fully Mechanized	95% <= 2 Hours	26849	26888	99.85%
Jan-06	UNE	Fully Mechanized	95% <= 2 Hours	69720	70939	98.28%
Feb-06	Resale	Fully Mechanized	95% <= 2 Hours	15564	15600	99.77%
Feb-06	UNE	Fully Mechanized	95% <= 2 Hours	49482	50504	97.98%
Mar-06	Resale	Fully Mechanized	95% <= 2 Hours	24535	24879	98.62%
Mar-06	UNE	Fully Mechanized	95% <= 2 Hours	56936	59560	95.59%
Apr-06	Resale	Fully Mechanized	95% <= 2 Hours	21252	21400	99.31%
Apr-06	UNE	Fully Mechanized	95% <= 2 Hours	47216	50430	93.63%
May-06	Resale	Fully Mechanized	95% <= 2 Hours	51885	51939	99.90%
May-06	UNE	Fully Mechanized	95% <= 2 Hours	47064	47996	98.06%
Jun-06	Resale	Fully Mechanized	95% <= 2 Hours	19637	19684	99.76%
Jun-06	UNE	Fully Mechanized	95% <= 2 Hours	45346	46060	98.45%
Jul-06	Resale	Fully Mechanized	95% <= 2 Hours	18628	18707	99.58%
Jul-06	UNE	Fully Mechanized	95% <= 2 Hours	38582	39300	98.17%
Jan-06	Resale	Non Mechanized	95% <= 18 Hours	1005	1444	69.60%
Jan-06	UNE	Non Mechanized	95% <= 18 Hours	1397	1956	71.42%
Feb-06	Resale	Non Mechanized	95% <= 18 Hours	899	1058	84.97%
Feb-06	UNE	Non Mechanized	95% <= 18 Hours	1857	2049	90.63%
Mar-06	Resale	Non Mechanized	95% <= 18 Hours	2819	2991	94.25%
Mar-06	UNE	Non Mechanized	95% <= 18 Hours	2248	2448	91.83%
Apr-06	Resale	Non Mechanized	95% <= 18 Hours	1828	1872	97.65%
Apr-06	UNE	Non Mechanized	95% <= 18 Hours	1828	1967	92.93%
May-06	Resale	Non Mechanized	95% <= 18 Hours	1948	1975	98.63%
May-06	UNE	Non Mechanized	95% <= 18 Hours	2440	2661	91.69%
Jun-06	Resale	Non Mechanized	95% <= 18 Hours	870	903	96.35%
Jun-06	UNE	Non Mechanized	95% <= 18 Hours	1120	1480	75.68%
Jul-06	Resale	Non Mechanized	95% <= 18 Hours	1129	2508	45.02%
Jul-06	UNE	Non Mechanized	95% <= 18 Hours	2034	2566	79.27%
TOTAL						

Request: For B-10, please provide a flow chart with associated timeline showing steps to resolve billing adjustment requests.

Response: Attachment 3 provides the process flow for billing disputes. Staff requested a timeline associated with the steps to resolve billing adjustment requests. Rather than providing individual times for each step, BellSouth has grouped several steps together and provided the maximum times, in business days, for the different groupings:

Process Flow Steps ¹	TIMELINE FOR BILLING DISPUTES
Steps 1 – 6	[Day 1 – Day 10]: Steps 1-6 should occur within 10 business days
Not recorded on flow chart	[Day 11 – Day 12]: Dispute dollars in BST systems are balanced back to original customer submission to ensure that the dispute recorded matches the original submission. This step is a check that occurs immediately after the dispute is loaded, but before it is passed to the specific work group that will ultimately handle resolution
Step 7	[Day 13 – 18]: Dispute is in the system. Work is assigned to a work group. The length of time required for this step is dependent on volume of work to be distributed and based on received date, skill level and work load. Work may be held in this step until other work assigned to this same work group is approaching completion.
Step 8	[Day 18 – Day 40]: After the dispute is assigned to the service representative work list, it is prioritized by received date. Investigation steps may include evaluation of billing, review of service order, reference to contract, reference to work instructions, referral to internal SME--contract negotiator, product manager, legal or other staff support. This step also varies with the size of the dispute and the relationship to other disputes also assigned to the service representative.
Step 9 & 10	[Day 41 – Day 45]: The steps of creating the service order to correct or make the adjustment, if necessary; and preparing and mailing the response to the customer is usually completed in 1-2 days. Step 10 is the completion of the initial resolution process that must be completed within 45 business days.
10.2.6 & 10.3.6	These steps are the customer's responsibility to review BST's dispute response and concur or escalate. In absence of escalation, the dispute is considered resolved.

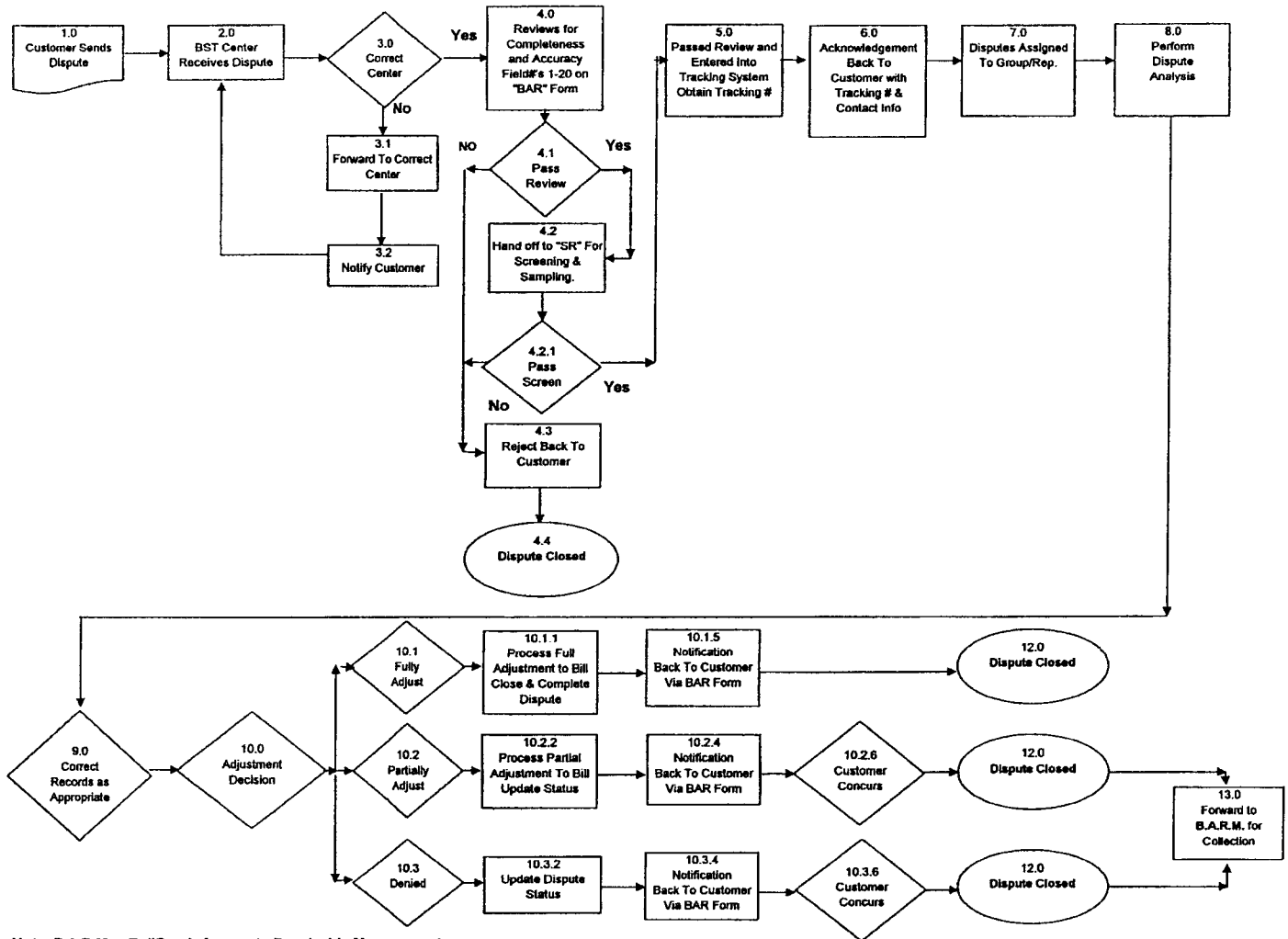
¹Attachment 3 specifies each of the steps individually.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to Staff's Follow-up Questions
From October 11, 2006 Conference Call
Filing Date: October 19, 2006
Item No. 6
Page 2 of 2

It is important to note that the time required to perform each step, or each group of steps, varies based on several factors. The most important factor is the volume of requests that BellSouth receives for billing adjustments. Thus, thinking in terms of the time to perform each step for a single request oversimplifies the environment in which these resolutions take place. In particular, the same group handles adjustment requests not only for CLECs, but also for Interexchange Carriers (IXCs) as well. BellSouth uses the same dispute process in both cases. Moreover, BellSouth receives a large volume of requests and most are invalid disputes. For example, for facility-based CLECs for the period July 2005 through early October 2006, only 17% of the items disputed resulted in a credit to the CLEC customer. In other words, no billing errors occurred on 83% of the submitted disputes. This large proportion of disputes where no error occurred creates very large unnecessary volumes in the dispute process that adds time to the intervals for responding to and resolving all disputes. In evaluating the appropriate standards for this process, it should be recognized that BellSouth spends the overwhelming majority of its effort in this area validating billing that is accurate. Consequently, before any shorter intervals are required, significant incentives should first be created to reduce the huge volume of disputes that are submitted where no error has occurred.

Finally, CLECS have agreed to the dispute process in Interconnection Agreements and commercial agreements that outline a 60 calendar day resolution period (45 business days). BellSouth has staffed its operations to comply with the provisions of those Agreements. Any increased staffing to meet shorter intervals needs to be negotiated with CLECs to achieve offsets to those costs in other areas.

"PROCESS FLOW FOR BILLING DISPUTES"



Request: For CM-8, please provide additional clarification on how BellSouth determines the basis for rejecting a change request due to cost.

Response: During the call with Staff on October 11, 2006, with respect to rejecting change requests for cost, Staff noted that one of the factors listed in BellSouth's July 28, 2006 filing was "cost (both from a Center and System perspective) in high, medium or low categories" and wanted more information regarding this consideration. In response to this consideration, it is important to point out that because of the multiple variables that must be assessed with each change request (CR), BellSouth does not assign a specific dollar amount when classifying a CR as high, medium or low. For example, there may be a CR for a particular type of order that is classified as high-impact from a center perspective because of the high volume of orders that are being handled manually by that order type. However, the work, from a systems standpoint, to mechanize that order type is minimal and may be considered a level of work that is of a low order of magnitude. In this example, BellSouth would assess the cost to mechanize the particular order type, compared to the cost of center personnel manually handling those orders. Also, because there is a wide range of volumes for each order type, combined with the wide range of times it takes to manually handle each order type, it is not feasible to create a static number assigned to each category. Instead, each CR must be assessed by taking into account the multiple factors involved to determine if it makes good business sense to implement. For example, based upon the unique situation, does the cost of implementing the CR justify the benefit within a reasonable payback period, i.e., a typical business case analysis.

Also, on the October 11th call, Staff wanted to know if benefits were considered as well as costs in deciding whether or not to reject a change request. In making a determination of whether a CR should be accepted or rejected, BellSouth does conduct a cost/benefits analysis, which examines, for example, the following areas that are beneficial to CLEC operations.

- Regarding the LCSC, would this request result in:
 - A significant increase or decrease in manual handling?
 - A significant increase or decrease in work steps/hand-offs?
 - A significant increase or decrease in order flow-through?
- Taking into account the CLEC order volume, is this request cost-justifiable?

Request: Please provide a response to the CLECs' response to staff's first set of action items, item 3 (CLEC response provide on October 5, 2006) regarding Section 4.4.7.2 of the SEEM Administrative Plan.

Response: BellSouth proposes the following alternative language for this section of the SEEM administrative section

4.4.7.2 If a SEEM overpayment is made to a CLEC, and BellSouth's SEEM liability calculated and payable to that CLEC in the next month's payment cycle is insufficient to cover the overpayment, BellSouth will notify the CLEC in writing of the remaining overpayment balance. The CLEC will have ninety (90) days from the date of such written notice to repay the remaining balance. If after ninety (90) days additional overpayment monies are due BellSouth, BellSouth may petition the Commission for an order requiring immediate payment from the CLEC plus any applicable penalties for nonpayment. BellSouth shall continue to apply any future SEEM liabilities payable to the CLEC against the remaining overpayment balance for the CLEC until full repayment is made by the CLEC.

The above changes are only proposed as part of a package that includes the following changes in the SEEM plan as well:

2.6 BellSouth shall pay ~~penalties~~ remedies to the Commission, in the aggregate, for all reposted SQM and SEEM reports in the amount of \$400 per day, less a ninety (90) day grace period due to Data Notification requirements, for a maximum of 120 days. The circumstances which may necessitate a reposting of SQM reports are detailed in Appendix F, Reposting of Performance Data and Recalculation of SEEM Payments. Such payments shall be made to the Commission for deposit into the state General Revenue Fund within fifteen (15) calendar days of the final publication date of the report or the report revision date.

4.4.2 For each day after the due date, less a ninety (90) day grace period, that ~~BellSouth fails to pay~~ pays a CLEC less than the required amount, BellSouth will pay the CLEC 6% simple interest per annum on the difference between the required amount and the amount previously paid. The underpayment and any required interest will be paid to the CLEC in the next month's billing cycle.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to Staff's Follow-up Questions
From October 11, 2006 Conference Call
Filing Date: October 19, 2006
Item No. 8
Page 2 of 2

- 4.4.4 **If a CLEC disputes the amount paid for Tier-1 Enforcement Mechanisms, the CLEC shall submit a written claim to BellSouth within sixty (60) days after the payment date. BellSouth shall investigate all claims and provide the CLEC written findings within thirty (30) days after receipt of the claim. If BellSouth determines the CLEC is owed additional amounts, BellSouth shall pay the CLEC such additional amounts within thirty (30) days after its findings. If such additional amounts are not paid within ninety (90) days of BellSouth's determination that the CLEC is owed these additional amounts, BellSouth will also pay the CLEC along with 6% simple interest per annum.**

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to Staff's Follow-up Questions
From October 11, 2006 Conference Call
Filing Date: October 19, 2006
Item No. 9
Page 1 of 1

Request: Please provide a response to the CLECs' response to staff's first set of action items, item 4 regarding Section 4.6.1 of the SEEM Administrative Plan.

Response: BellSouth will agree to add this language to section 4.6.1 of the SEEM administrative plan.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to Staff's Follow-up Questions
From October 11, 2006 Conference Call
Filing Date: October 19, 2006
Item No. 10
Page 1 of 1

Request: Please provide a flow chart of the various ways to order commingled arrangements.

Response: Attachment 4 contains the typical commingled arrangements and flow charts.

Typical Commingling Arrangements

Attachment 4

BellSouth Telecommunications, Inc.
Attachment 4

Excerpt from FCC Triennial Review Order (TRO)

¶ 579. We therefore modify our rules to affirmatively permit requesting carriers to commingle UNEs and combinations of UNEs with services (e.g., switched and special access services offered pursuant to tariff), and to require incumbent LECs to perform the necessary functions to effectuate such commingling upon request. **By commingling, we mean the connecting, attaching, or otherwise linking of a UNE, or a UNE combination, to one or more facilities or services that a requesting carrier has obtained at wholesale from an incumbent LEC pursuant to any method other than unbundling under section 251(c)(3) of the Act, or the combining of a UNE or UNE combination with one or more such wholesale services.** Thus, an incumbent LEC shall permit a requesting telecommunications carrier to commingle a UNE or a UNE combination with one or more facilities or services that a requesting carrier has obtained at wholesale from an incumbent LEC pursuant to a method other than unbundling under section 251(c)(3) of the Act. In addition, upon request, an incumbent LEC shall perform the functions necessary to commingle a UNE or a UNE combination with one or more facilities or services that a requesting carrier has obtained at wholesale from an incumbent LEC pursuant to a method other than unbundling under section 251(c)(3) of the Act. As a result, competitive LECs may connect, combine, or otherwise attach UNEs and combinations of UNEs to wholesale services (e.g., switched and special access services offered pursuant to tariff), and incumbent LECs shall not deny access to UNEs and combinations of UNEs on the grounds that such facilities or services are somehow connected, combined, or otherwise attached to wholesale services.

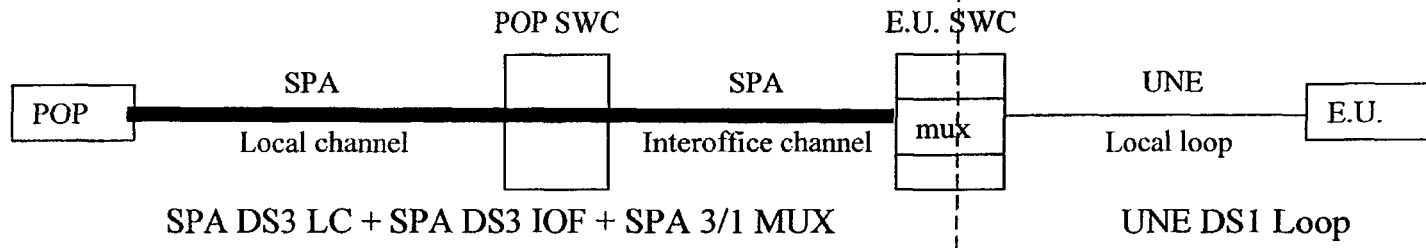
582 ...Thus, our rules permit incumbent LECs to assess the rates for UNEs (or UNE combinations) commingled with tariffed access services on an element-by-element and a service-by-service basis...

Florida Commission (Docket No. 041269-TP)

The Florida Commission in Order No. PSC-06-299-FOF-TP, dated 04/17/06 ruled as follows concerning commingling:

BellSouth is required to commingle or to allow commingling of a UNE or UNE combination with one or more facilities or services that a CLEC has obtained at wholesale from an ILEC pursuant to any method other than unbundling under §251(c)(3). However, this does not include offerings made available under §271. Also, BellSouth is not required to effectuate commingling with a third party's service or a CLEC-provided service. Finally, staff recommends that multiplexing rate in a commingled circuit rate should be based on the higher bandwidth circuit.

Typical Case 1: MULTI-BANDWIDTH COMMINGLED SPA/UNE CIRCUIT



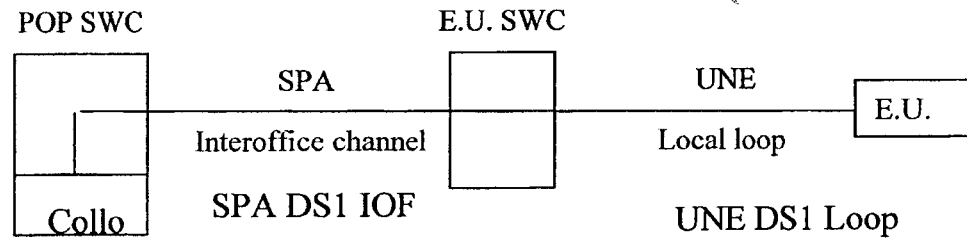
SPECIAL ACCESS CIRCUIT

- | |
|---|
| 1) BUSINESS AS USUAL |
| 2) ASR SUBMITTED TO ICSC |
| 3) 1 SERVICE ORDER REQUIRED |
| 4) MUST BE PROVISIONED PRIOR TO REQUESTING UNE LOOP CIRCUIT |

UNE LOOP CIRCUIT

- | |
|-----------------------------|
| 1) BUSINESS AS USUAL |
| 2) LSR SUBMITTED TO LCSC |
| 3) 1 SERVICE ORDER REQUIRED |
| 4) DATA REPORTED IN UNE |

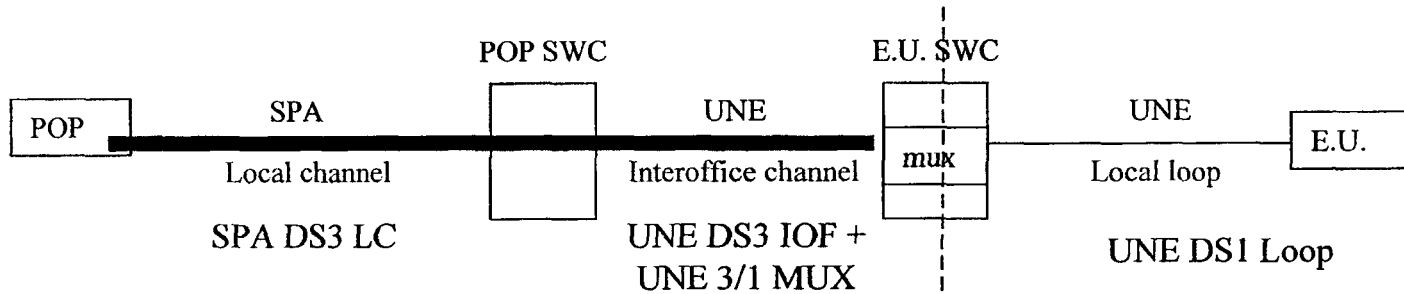
Typical Case 2: SINGLE BANDWIDTH COMMINGLED SPA/UNE CIRCUIT



SINGLE BANDWIDTH COMMINGLED (SBWC)

- 1) REQUEST SUBMITTED TO LCSC
- 2) 1 SERVICE ORDER REQUIRED AS SINGLE BANDWIDTH COMMINGLING (SBWC)

Typical Case 3: MULTI-BANDWIDTH COMMINGLED SPA/UNE CIRCUIT



SINGLE BANDWIDTH COMMINGLED CIRCUIT

- | |
|--|
| 1) REQUEST SUBMITTED TO LCSC |
| 2) 1 SERVICE ORDER REQUIRED AS SINGLE BANDWIDTH COMMINGLING (SBWC) |

UNE LOOP CIRCUIT

- | |
|-----------------------------|
| 1) BUSINESS AS USUAL |
| 2) LSR SUBMITTED TO LCSC |
| 3) 1 SERVICE ORDER REQUIRED |
| 4) DATA REPORTED IN UNE |