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December 1, 2006

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

**Re: Docket No. 060598-TL: Petition by BellSouth
Telecommunications, Inc., pursuant to Florida Statutes
§364.051(4), to Recover 2005 Tropical System Related Costs
and Expenses**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Late-Filed Deposition Exhibits (Nos. 1 – 8) for Kathy K. Blake, which we ask that you file in the captioned docket.

Copies of this letter will be served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

cc: Jerry D. Hendrix
E. Earl Edenfield, Jr.
James Meza III

CERTIFICATE OF SERVICE
Docket No. 060598-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 1st day of December, 2006 to the following:

Patrick Wiggins
Adam Teitzman
Felicia West
Theresa Lee Eng Tan
Staff Counsels
Florida Public Service
Commission
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Manuel A. Gurdian

(+) Signed Protective Agreement

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Represents NuVox
Represents CompSouth

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 060598-TL
Deposition of Kathy K. Blake
November 28, 2006
Late-Filed Exhibit No. 1

REQUEST: Please provide the number of Lifeline customers BellSouth provides service to.

RESPONSE: As Ms. Blake provided in the continuation of her deposition on Wednesday, November 29, 2006, as of June 2006, BellSouth provided service to 83,745 Lifeline customers. Lifeline customers will be excluded from the assessment of the line-item surcharge.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 060598-TL
Deposition of Kathy K. Blake
November 28, 2006
Late-Filed Exhibit No. 2

REQUEST: Please provide an example of a bill for a customer who purchases BRI-ISDN services from BellSouth.

RESPONSE: See attached which is an example of a Business BRI customer with three (3) BRI lines with two (2) B-Channels activated per ISDN line. BellSouth anticipates that the line-item charges to be assessed on this customer's bill to appear in the "Surcharges and Other Fees" section of the attached bill. This customer would be assessed a total "Storm Recovery Fee" of \$3.00 ($\$.50 \times 2 \text{ B-Channels} \times 3 \text{ ISDN lines} = \3.00) for 12 months.

305 [REDACTED] *ITEM* NOV 07 2006 *Live* E HMSD S4B

[REDACTED]

BST CHRGS A00100 PG 0003.1/0006
 your line(s) .

Line Number	Local Toll Company	Long Distance Company
ALL LINES	BELLSOUTH TELE.	[REDACTED]

Service Provider Contact Number
 BELLSOUTH TELE. 1 800 858-9413
 [REDACTED]

BellSouth Local and Local Toll Charges

Local Monthly Service	Quantity	Unit Charge	Amount
From November 7 through December 6			
1. ISDN B Channel Threshold Voice/Data	6	16.25	97.50
2. ISDN Threshold Pricing, Basic Rate DSL Access Arrangement, Business	3	55.00	165.00
Total Local Monthly Service			262.50



305 [REDACTED] *ITEM* NOV 07 2006 *Live* E HMSD S4B

[REDACTED]

BST CHRGS A0000100 PG 0004.2 / 0006 A00100

10. FCC Authorized Charge for Excess Line Port for Basic Rate ISDN Digital Subscriber Line	3	7.32
11. FCC Authorized Charge for Network Access	3	20.31
12. Federal Universal Service Charge	3	2.52
Total Surcharges and Other Fees		30.15
Total Local and Local Toll Charges		296.28

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 060598-TL
Deposition of Kathy K. Blake
November 28, 2006
Late-Filed Exhibit Nos. 3 and 4

REQUEST: No. 3: Please identify each service category as either basic telecommunications services or non-basic telecommunications services.

No. 4: Please provide a list of the USOCs and a description of the USOCs that are associated with the categories of service identified in the responsive documents provided to Staff's 1st Request for Production, Item No. 2 response, filed on October 8, 2006, and Revised on November 21, 2006.

RESPONSE: See proprietary documentation provided with a Request for Confidential Classification.

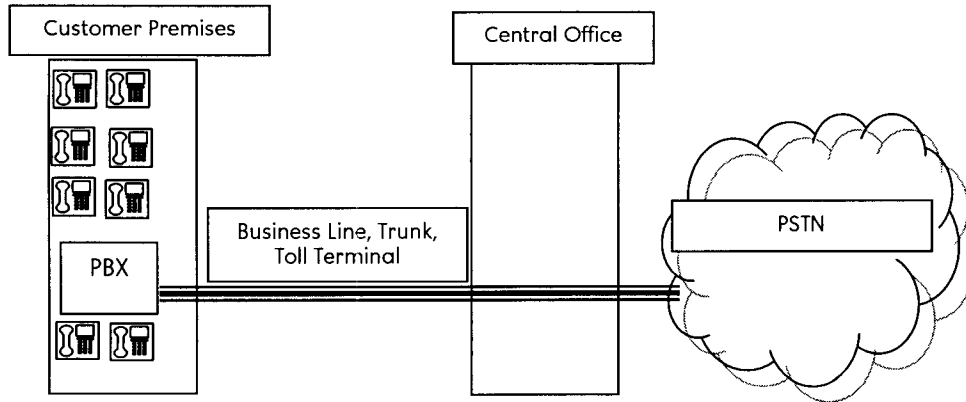
- REQUEST: a) Explain in narrative form how Centrex/ESSX/PBX services will be assessed the line item charge and how such application is consistent with the definition of an access line and the application proposed for T1 services.
b) Can a NAR carry more than one conversation at a time?

RESPONSE: a) Centrex/ESSX® service/PBX

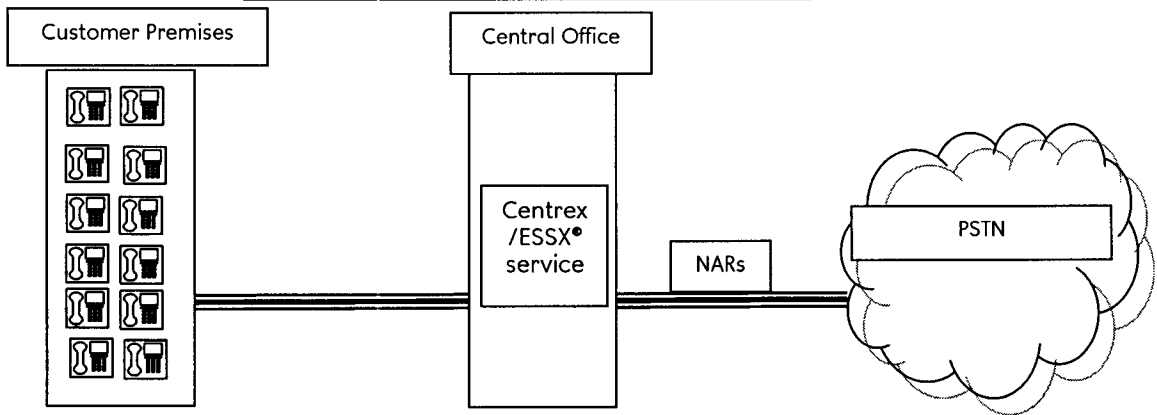
Centrex/ESSX® service and PBX can be viewed as similar services/products that customers use for business telecommunications. The major difference between the two systems is the location of the processors that provide the intelligence for the system. With Centrex/ESSX® service the processor is part of BellSouth's central office (old reference G.S.S.T., A12, Central Office Non-Transport Service Offerings). The PBX processor is located at the customer's premises. "Access lines" are used in conjunction with both services to connect to the Public Switched Telephone Network ("PSTN"). Centrex/ESSX® service utilizes Network Access Registers ("NARs") and PBX utilizes Business Lines, Business Trunks, Toll Terminals or Channelized MegaLink®/LightGate® for connection to the PSTN. When MegaLink® or LightGate® are used to provide PSTN access for a PBX it is channelized to provide individual "access line" capability. The presence of a MegaLink®/LightGate® NAR on the account represents an activated channel on the Channelized MegaLink®/LightGate® service and drives the assessment of the Storm Recovery Fee based on the quantity of MegaLink®/LightGate® NARs. Assessing the line-item surcharge on the activated channels ("utilized capacity") is consistent with the methodology BellSouth proposes to use to assess the line-item charge to CLECs that purchase high-capacity wholesale UNE loops from BellSouth. Because BellSouth is unable to determine the utilized capacity of high-capacity unbundled loops (DS1 and DS3), BellSouth is proposing to apply a 47% utilization factor to determine the line-item charges to be assessed to its CLEC unbundled loop customers.

Following are rough pictorials of the above services. In these scenarios the line-item surcharge would be assessed on the facility connecting the customer to the PSTN, i.e. the NARs, Trunks, etc. In the case of the channelized MegaLink® the local channel for the MegaLink® would also be assessed a line-item surcharge.

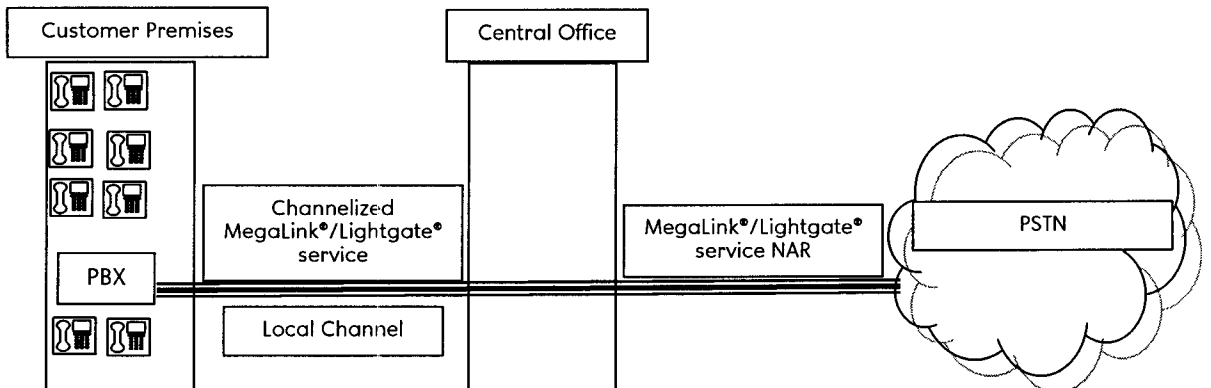
PBX EXAMPLE



CENTREX/ESSX® SERVICE EXAMPLE



CHANNELIZED MEGALINK®/LIGHTGATE®

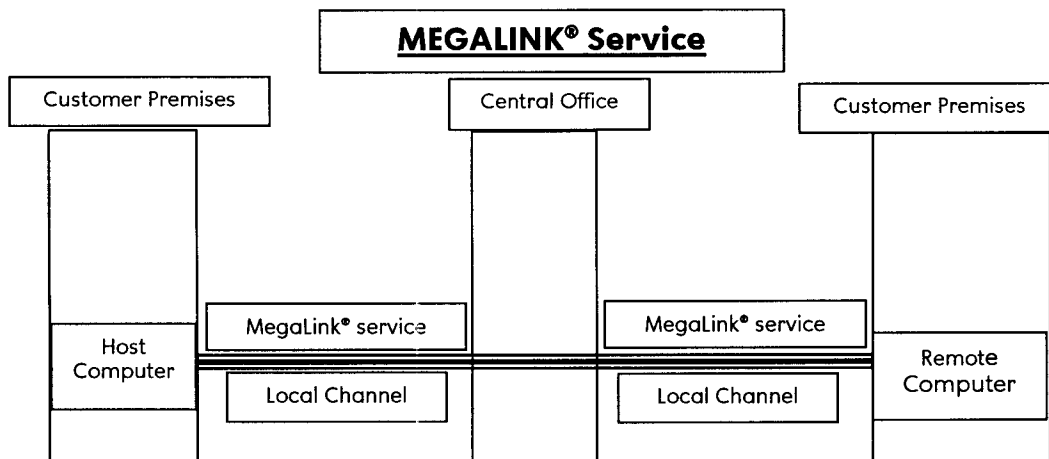


RESPONSE (Continued)

a) T1/DS1 (MegaLink® service)

When BellSouth refers to MegaLink® service without the term “Channelized” in front of it, it’s referring to a non-channelized service whereby a customer is utilizing the service at the full 1.544 Mbps rate. Customers that do not channelize the service normally use the circuits to transmit data. This same arrangement holds true for non-channelized Lightgate.

Following is a pictorial of MegaLink® service. In this scenario the customer would be assessed the line-item surcharge for the two local channels associated with the MegaLink® service.



RESPONSE b) No.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 060598-TL
Deposition of Kathy K. Blake
November 29, 2006
Late-Filed Exhibit No. 6

REQUEST: Please provide revised retail line counts based upon the assumption that “activated channels” would not be included in the total number of retail lines that would be assessed the line-item charge.

RESPONSE: The revised count of retail lines is included in the attached. This data is based upon the assumption that only the “facility” would be counted and not the channels that have been activated (BellSouth does not agree with this type of methodology). As a result, the quantity of Basic Rate ISDN B-Channels, Primary Rate ISDN B-Channels, MegaLink/LightGate NARs, and Private Line Local Channels decreases as reflected in the proprietary documentation provided with a Request for Confidential Classification.

REQUEST: Refer to BellSouth's responsive documents to Staff's 1st Request for Production, Item No. 2, Attachment A filed on October 8, 2006. With respect to the produced chart containing column headings of Description, USOC, CRIS Basic Class of Service, CABS Basic Class of Service, UNE Loop, and Rate,

- (a) Please explain why the USOC Code "UEAL2" is shown to have Class of Service under both CRIS and CABS.
- (b) Please explain why the DS1 Loop with the USOC Code of USLXX is identified as a DS0 Loop and will only be charged the \$0.50 line-item charge.

RESPONSE: (a) For the UVL-SL1 Loop, there should not have been an entry under the CABS Basic Class of Service column.

(b) The DS1 Loop with a USOC of USLXX was mistakenly identified as "DS0" in the UNE Loop column. It should have been identified as a DS1 Loop and the amount in the "Rate" column should have been \$12.00.

Neither of these corrections impacts the assessment of the line-item charge.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
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Deposition of Kathy K. Blake
November 29, 2006
Late-Filed Exhibit No. 8

REQUEST: Please provide documentation demonstrating how BellSouth determined the 47% utilization factor to be applied to the maximum capacity of DS1 and DS3 unbundled loops.

RESPONSE: Please see proprietary documentation provided with a Request for Confidential Classification.