

Robert A. Culpepper
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0841

December 12, 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 action items arising out of the December 6, 2006 plan review 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

661082

**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 12th day of December, 2006 to the following:

Adam Teitzman
Jerry Hallenstein
Lisa Harvey
David Rich
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6175
Fax. No. (850) 413-6250
ateitzma@psc.state.fl.us
jhallens@psc.state.fl.us
lsharvey@psc.state.fl.us
drich@psc.state.fl.us

Tracy W. Hatch
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel No. (850) 425-6360
Fax No. (850) 425-6361
thatch@att.com

Sonia Daniels
AT&T
1230 Peachtree Street
Suite 400
Atlanta, GA 30309
Tel. No. (404) 810-8488
Fax. No. (281) 664-9791
soniadaniels@att.com

Verizon, Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Tel. No. (813) 483-2617
Fax. No. (813) 223-4888
kimberly.caswell@verizon.com

Peter M. Dunbar, Esquire
Karen M. Camechis, Esquire
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box 10095 (32302)
215 South Monroe Street, 2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
pete@penningtonlawfirm.com

Supra Telecommunications and
Information Systems, Inc.
Marva Johnson
2901 S.W. 149th Avenue
Suite 300
Miramar, FL 33027-4153
Phone: (786) 455-4248
FAX: (786) 455-4600
marva.johnson@supratelecom.com

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Douglas C. Nelson
Sprint Nextel
233 Peachtree Street, NE
Suite 2200
Atlanta, GA 30303
Tel. No. 404 649-0003
Fax No. 404 649-0009
douglas.c.nelson@sprint.com

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5493
Fax. No. (770) 284-5488
brian.sulmonetti@wcom.com

William Weber, Senior Counsel
Gene Watkins (+)
Covad Communications
1230 Peachtree Street, N.E.
19th Floor, Promenade II
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (508) 300-7749
wweber@covad.com
jbelle@covad.com
gwatkins@covad.com

John Rubino
George S. Ford
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, Florida 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond
& Sheehan, PA
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@moylelaw.com
Represents KMC Telecom
Represents Covad
Represents Mpower

Jonathan E. Canis
Kelley Drye & Warren, LLP
1200 19th Street, N.W., Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jcanis@kelleydrye.com

Tad J. (T.J.) Sauder
Manager, ILEC Performance Data
Birch Telecom of the South, Inc.
2300 Main Street FL
Kansas City, MO 64108
Tel. No. (816) 300-3202
Fax. No. (816) 300-3350

John D. McLaughlin, Jr.
KMC Telecom
1755 North Brown Road
Lawrence, Georgia 30043
Tel. No. (678) 985-6262
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335-8349
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474
aisar@millerisar.com

Renee Terry, Esq.
e.spire Communications, Inc.
14405 Laurel Pl.
Suite 200
Laurel, MD 20707-6102
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

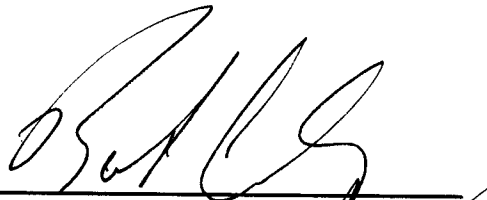
Mr. David Woodsmall
Mpower Communications, Corp.
175 Sully's Trail
Suite 300
Pittsford, NY 14534-4558
Tel. No. (585) 218-8796
Fax. No. (585) 218-0635
dwoodsmall@mpower.com

Dulaney O'Roark III (+)
WorldCom, Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5498
De.OROark@mci.com

Matthew Feil
FDN Communications
2301 Lucien Way, Suite 200
Maitland, FL 32751
Tel. No. (407) 835-0460
mfeil@mail.fdn.com

Bill L. Bryant, Jr.
Akerman Senterfitt
106 East College Avenue
Suite 1200
Tallahassee, FL 32301
Tel. No. (850) 224-9634
Bill.Bryant@akerman.com

D. Anthony Mastando
DeltaCom
VP-Regulatory Affairs
Senior Regulatory Counsel
Ste 400
7037 Old Madison Pike
Huntsville, AL 35806
Mary.Conquest@deltacom.com



Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

REQUEST: For each year 2004 through 2006, please provide the number of BellSouth staff dedicated to working CLEC billing dispute transactions and the volume of disputes handled.

RESPONSE: BellSouth has a centralized workforce that handles billing adjustment requests, which includes Access Services sold via tariff, local interconnection and UNEs for CABS (Carrier Access Billing System) billed items for the entire region served by BellSouth. Therefore, the workforce levels required to resolve only local interconnection and UNE disputes, or to resolve CABS billed disputes for a specific state cannot be determined. Similarly, BellSouth has a separate group that handles billing disputes associated with resale and commercial agreements billed from CRIS (Customer Records Information System) and IBS (Integrated Billing System). This workforce level cannot be divided between these two types of disputes (resale vs. commercial agreements), or by state.

Consequently, Attachment 1 shows the staffing levels for handling billing disputes for Access, Interconnection and UNE services and the total number of associated disputes resolved by that group. This attachment also provides the staffing levels for handling billing disputes related to resale & commercial agreements and the associated total number of disputes resolved by that group.

Access, Interconnection & UNEs		Total Disputes	Svc Reps	Supv	Resale / Commercial Agreements	Disputes	Svc Reps	Supv	
2006	Jan	53,381	70	6	2006	Jan	1,977	23	2
	Feb	47,966	71	6		Feb	2,577	23	2
	Mar	43,998	71	6		Mar	2,116	23	2
	Apr	31,308	70	6		Apr	1,740	23	2
	May	73,691	70	6		May	1,957	23	2
	Jun	75,690	69	6		Jun	2,183	23	2
	Jul	54,100	69	5		Jul	1,714	23	2
	Aug	69,316	65	5		Aug	1,995	23	2
	Sep	41,198	65	5		Sep	1,816	21	2
	Oct	66,259	63	5		Oct	1,521	20	2
	Nov	N/A	63	5		Nov	N/A	19	2
	Dec	N/A	N/A	N/A		Dec	N/A	N/A	N/A
		556,907				19,596			
Access, Interconnection & UNEs		Total Disputes	Svc Reps	Supv	Resale / Commercial Agreements	Disputes	Svc Reps	Supv	
2005	Jan	55,313	78	7	2005	Jan	2,766	30	2
	Feb	33,923	78	7		Feb	2,225	29	1
	Mar	55,432	79	7		Mar	3,433	29	2
	Apr	56,334	70	7		Apr	3,408	24	1
	May	101,872	70	7		May	2,087	24	2
	Jun	84,238	68	7		Jun	2,740	24	2
	Jul	56,407	68	6		Jul	2,814	24	2
	Aug	53,394	69	6		Aug	2,437	23	1
	Sep	73,141	68	6		Sep	2,191	23	1
	Oct	99,451	68	6		Oct	1,855	23	2
	Nov	144,531	69	6		Nov	2,222	22	2

Action Item 3

Wholesale Billing Disputes – Staffing and Volume

Attachment 1

		Dec	51,479	69	6			Dec	2,022	22	2
		865,515						30,200			
Access, Interconnection & UNEs		Total Disputes	Svc Reps	Supv	Resale / Commercial Agreements		Disputes	Svc Reps	Supv		
2004	Jan	143,670	85	7	2004	Jan	3,046	30	2		
	Feb	72,127	85	7		Feb	3,374	30	2		
	Mar	174,160	84	7		Mar	2,493	29	2		
	Apr	95,066	83	7		Apr	2,250	29	2		
	May	139,552	83	7		May	2,401	29	2		
	Jun	131,100	82	7		Jun	2,243	28	2		
	Jul	33,104	81	7		Jul	2,670	28	2		
	Aug	130,665	81	7		Aug	2,046	28	2		
	Sep	55,396	81	7		Sep	1,856	28	2		
	Oct	50,289	80	7		Oct	2,027	28	2		
	Nov	40,202	80	7		Nov	1,753	28	2		
	Dec	81,973	80	7		Dec	2,461	28	2		
		1,147,304					28,620				

REQUEST: Please provide BellSouth's average turn-around time for responding to billing disputes for large retail customers

RESPONSE: BellSouth does not have a dedicated group to handle billing disputes for large retail customers. When a large retail customer has a question or dispute concerning billing, the customer typically contacts either its Account Executive (AE) or Customer Sales Associate (CSA). Both the AEs and CSAs handle a variety of issues from the customer, not just billing issues, and the average response times for these retail billing dispute resolutions are not systematically tracked. Consequently, BellSouth cannot provide average turn-around times for these disputes. However, retail disputes originated from BellSouth's Collection center are captured. This occurs when the customer initiates a billing dispute during the collection process. Data for the past four years are summarized in the table below.

Year	Total Disputes	Disputes Resolved Within 60 Calendar Days	Percent Resolved Within 60 Calendar Days	Average Time to Resolve (Calendar Days)
2003	10606	4090	38.56%	46
2004	8584	5072	59.09%	34
2005	12990	6101	46.97%	32
2006	7362	3802	51.64%	40

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to December 6, 2006
Workshop Action Items
Filing Date: December 12, 2006
Item No. 6
Page 1 of 1

REQUEST: Since the inception of PAP, please provide all occurrences of SEEM reposting, including the data month reposted, the date reposted, and any associated penalties for late reposting.

RESPONSE: There has only been one instance where BellSouth reposted SEEM data. This occurred for the August 2004 data month. Specifically, BellSouth made SEEM payments and posted the associated PARIS reports on 10/13/2004. Subsequently, due to a special data run for Hurricane Charley, BellSouth made a second SEEM payment and reposted the associated PARIS reports on 10/28/04. The second SEEM payment was issued in order to pay Provisioning and M&R measures for the first two weeks for all wire centers and for the last two weeks in the wire centers that were not affected by Hurricane Charley. Other than interest charges due to the late payments, no penalties were paid as a result of such reposting.