



IDS TELCOM Headquarters 1525 N.W. 167th Street, Suite 200, Miami, Florida 33169 U.S.A.  
T+ 305 913 4000 F+ 305 913 4024 TOLL FREE+ 800 335 4437

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Ms. Blanca S. Bayo, Director  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

*(undated)*

RE: Informal complaint against BellSouth Telecommunications Inc. pursuant to Rule 25-22.032, Florida Administrative Code

Dear Ms. Bayo:

I am writing on behalf of IDS Telcom LLC ("IDS"), a certificated Florida CLEC headquartered in Miami. We are wholesale customers of BellSouth Telecommunications, Inc. ("BellSouth") pursuant to a commission-approved agreement. Please consider this letter as IDS' informal complaint against BellSouth regarding a series of billing and service problems described below.

We have attempted to work through these problems with BellSouth and have paid the undisputed portions of BellSouth's billings. However, BellSouth has refused to recognize the legitimacy of our disputes, and instead of attempting to resolve our differences, is threatening discontinuance of service.

Briefly, our disputes with BellSouth fall roughly into the following categories:

1. Conversion charges: Although the charge for UNE conversions decreased in our latest Interconnection Agreement, BellSouth erroneously continues to charge the old rate and its bills are therefore artificially inflated.
2. Engineering charges: BellSouth erroneously imposes engineering charges for which there is no documentation or an otherwise adequate method for validating charges; further, BellSouth is charging us for repairs on the BellSouth side of the demarcation point.
3. Non-Basic 1 and Non-Basic 4 charges: BellSouth erroneously bills non basic charges on basic UNE lines.
4. Port install and disconnect charges: BellSouth inappropriately charges multiples of the first-line port install or disconnect charge for all lines on multi-line orders, rather than charging the first-line rate for the first line, and a lower rate for additional lines. Additionally, BellSouth charges a disconnect fee to IDS when

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP 1 - for  
COM \_\_\_\_\_ *handling*  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL 1 - for  
OPC \_\_\_\_\_ *info*  
MMS \_\_\_\_\_  
SEC 1  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

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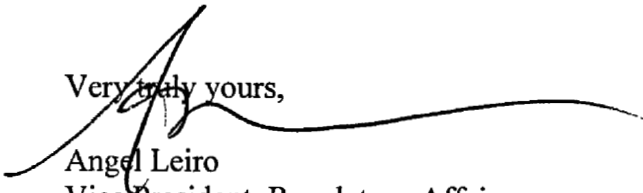
BellSouth or a third party carrier wins an IDS customer, even though IDS placed no order with BellSouth.

5. Port/loop rerates: Although the charge for port/loop combo monthly recurring charges changed, BellSouth mistakenly continued to charge the old rate for a period of time, and failed to credit IDS for such overcharges.
6. Usage rerates: Although usage rates changed, BellSouth mistakenly continued to charge the old rate for a period of time, and failed to credit IDS for all such overcharges.
7. Market-based rates: BellSouth bills IDS an improper rate for ports on accounts in excess of four lines and fails to bill in a mechanized fashion. Further, in some cases BellSouth improperly bills a market-based rate on lines that are not in the MSA.
8. Issues subject to confidentiality requirements: There are several additional issues that I cannot describe more fully in this letter because they are covered by a confidentiality agreement. However, BellSouth has been placed on notice of these disputes and therefore is aware of them. IDS will comply with reasonable Staff requests for information regarding these issues, subject to confidentiality requirements.

The above errors have resulted in BellSouth overcharging IDS approximately \$3.3 million to date. This amount will change over time because the problems are continuing in nature.

We believe that some of these problems result from problems with BellSouth's billing system, but are exacerbated by BellSouth's failure to promptly acknowledge and properly process billing disputes. On numerous occasions IDS has requested a reconciliation of accounts and asked BellSouth to provide supporting detail, but BellSouth refuses to supply us with the requested information. We have tried in good faith to resolve these complaints directly with BellSouth, but have been unable to do so. We therefore request Florida Public Service Commission assistance in investigating these problems as well as ensuring that BellSouth does not discontinue any service to us, as threatened, pending such investigation.

Very truly yours,

  
Angel Leiro

Vice President, Regulatory Affairs

cc: BellSouth Local Contract Manager  
ICS Attorney  
Maxine Alegar  
BellSouth Telecommunications, Inc.