

ORIGINAL

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August 12, 2004

VIA HAND DELIVERY

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

RECEIVED-FPSC
AUG 12 PM 4:38
COMMISSION
CLERK

Re: Docket No. 031125-TP

Dear Ms. Bayo:

On behalf of IDS Telcom, LLC, enclosed for filing and distribution please find the original and fifteen copies of:

- 08809-04 • Rebuttal Testimony and Exhibits of Raquel Rencher and Elizabeth Fefer (panel);
- 08810-04 • Rebuttal Testimony and Exhibits of Elizabeth Fefer;
- 08811-04 • Rebuttal Testimony and Exhibits of Jermaine Johnson;
- 08812-04 • Rebuttal Testimony and Exhibits of Angel Leiro;
- 08813-04 • Rebuttal Testimony and Exhibit of Joseph Gillan.

Also, note that attached to the Rebuttal Testimony of Ms. Rencher and Ms. Fefer as an exhibit is a CD containing voluminous billing information. We have enclosed 5 copies of this CD as well as provided one to each of the parties. If more are needed, please let me know.

CMP

COM 3 + orig

CTR _____

ECR _____

GCL 1

OPC _____

MMS _____

RCA 1

SCR _____ Enclosures

SEC 1

OTH _____

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

RECEIVED & FILED

on

FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint against BellSouth)
Telecommunications, Inc., for alleged)
overbilling and discontinuance of service)
And petition for emergency order restoring)
Service, by IDS Telcom LLC.)
_____)

Docket No. 031125-TP
Filed: August 12, 2004

REBUTTAL TESTIMONY AND EXHIBITS

OF

RAQUEL RENCHER & ELIZABETH FEFER
(PANEL)

ON BEHALF OF

IDS TELCOM, LLC.

DOCUMENT NUMBER-DATE

08809 AUG 12 8

FPSC-COMMISSION CLERK

1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2 DOCKET NUMBER 031125-TP

3 JOINT REBUTTAL TESTIMONY AND EXHIBITS OF

4 RAQUEL RENCHER AND ELIZABETH FEFER

5 ON BEHALF OF IDS TELCOM, LLC

6 AUGUST 12, 2004

7
8
9 **Q. PLEASE STATE YOUR NAME AND THE PARTY YOU ARE**
10 **REPRESENTING.**

11 A. Our names our Raquel Rencher and Elizabeth Fefer, and we are jointly
12 sponsoring this testimony on behalf of IDS. We previously filed Joint Direct
13 Testimony on behalf of IDS in this proceeding.

14
15 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

16 A. The purpose of our Rebuttal Testimony is to address the statements,
17 implications, and issues raised in the Direct Testimony of Kathy K. Blake filed in
18 this docket, which relate to the "Market-Based Rate" dispute.

1 **"MARKET-BASED RATE" DISPUTE (ISSUES 5(B) AND 5(C))**

2
3 **Q. BEGINNING ON PAGE 9 OF MS. BLAKE'S DIRECT TESTIMONY, SHE**
4 **CONTENDS THAT IDS DID NOT PROPERLY DISPUTE BELLSOUTH'S**
5 **"MARKET-BASED RATE" BILLS. DO YOU AGREE?**

6 **A.** No. First, Ms. Blake ignores the fact that two different interconnection
7 agreements are at issue. The "Market-Based Rate" dispute in this docket arises
8 from five different back-billings of so-called "Market-Based Rates." Each of the
9 five back-billings purports to charge IDS an additional difference between cost-
10 based rates and the "Market-Based Rates." A notation in the rate sheets
11 explains the process involved. The Prior Agreement contained a notation in
12 Exhibit B, Attachment 2 (rate sheets), under the heading "Unbundled Port/Loop
13 Combinations – Market Rates" which stated:

14 *BellSouth currently is developing the billing capability to*
15 *mechanically bill the recurring unbundled port Market Rates in this*
16 *section as well as the nonrecurring Market Rates in this section for*
17 *Currently Combined port/loop combinations in Zone 1 of the Top 8*
18 *MSAs in BellSouth's region for end users with 4 or more DSO*
19 *equivalent lines. In the interim, BellSouth shall bill the rates in the*
20 *Cost-Based section preceding in lieu of such Market Rates and*
21 *reserves the right to true-up the billing difference.*
22

23 That rate sheet that can be found in a November 2001 Amendment to the Prior
24 Agreement, and is dated 8/13/01 (Exhibit No.____(RR/EF-9)). Similar language
25 can be found in a 4/10/03 Amendment to the Current Agreement (Exhibit
26 No.____(RR/EF-10)).

1 Q. CAN YOU EXPLAIN THE TIME FRAME OF THE FIRST FOUR
2 "MARKET-BASED RATE" BACK-BILLING DISPUTES?

3 A. As the rate sheets indicate, BellSouth submits its monthly recurring bills to
4 IDS for UNE-P service at cost-based rates. BellSouth later attempts to back-bill
5 the difference between cost-based rates and the so-called "market-based rates."
6 Three of the back-billings fall exclusively under the Prior Agreement, and are
7 summarized on page 1 of Exhibit No._____(RR/EF-3) to our Direct Testimony.
8 Those back-billings were dated: (a) 10/17/02 (for the time period 10/17/01
9 through 1/16/02); (b) 12/17/02 (for the time period 1/17/02 through 3/16/02); and
10 (c) 3/17/03 (for the time period 3/17/02 through 5/16/02). The fourth back-billing
11 was submitted with the May 17, 2003 billing, but covered the time period of
12 5/17/02 through 2/16/03. Though the effective date of the Current Agreement
13 was 2/5/03, for all intents and purposes the fourth back-billing arose under the
14 Prior Agreement as well. A summary of the fourth back-billing is attached as
15 Exhibit No._____(RR/EF-4) to our Direct Testimony.

16

17 Q. WHAT WAS REQUIRED UNDER THE PRIOR AGREEMENT TO
18 PROPERLY SUBMIT A BILLING DISPUTES?

19 A. Under Paragraph 2.1.1 of the Prior Agreement, all that was required was
20 written notification upon discovery of the dispute. The use of BAR forms was
21 only optional, as that provision states:

22 *Each Party agrees to notify the other Party in writing upon*
23 *discovery of a billing dispute. If IDS utilizes the process for*
24 *submitted a billing dispute electronically via BellSouth's website*
25 *and includes its e-mail address in the appropriate field on the Billing*

1 *Adjustment Request Form (“BAR”), then BellSouth will notify IDS at*
2 *the e-mail address provided by IDS as to whether a billing dispute*
3 *is accepted or denied.”*
4

5 (See Exhibit No.____(RR/EF-7), at page 4 of 5, to our Joint Direct Testimony).

6 For each of the first four back-billings, IDS did notify BellSouth in writing of the
7 billing disputes. Moreover, IDS even used BAR forms for most (if not all) of these
8 disputes. (See Exhibit No.____(RR/EF-6) to our Joint Direct Testimony). Thus
9 IDS properly raised these disputes in accordance with the Prior Agreement.

10

11 **Q. WHAT ELSE DID IDS DO TO RAISE THESE FIRST-FOUR “MARKET-**
12 **BASED RATE” BILLING DISPUTES?**

13 A. IDS also corresponded with BellSouth via e-mail on these disputes and
14 even escalated them through higher levels of management. Provided with this
15 testimony is a CD-ROM containing various electronic files broken out into four
16 separate exhibits. One of the exhibits on the CD-ROM is identified in a directory
17 as Exhibit No.____(RR/EF-11), and contains three Microsoft Excel
18 Spreadsheets (one for each Florida UNE “Q” Account) providing detail regarding
19 the fourth back-billing dispute (May 2003). Some of the general information in
20 electronic Exhibit No.____(RR/EF-11) was provided to BellSouth as part of the
21 escalation process (and had BellSouth continued discussions with IDS, all of the
22 information would have been provided).

23

24 **Q. WHAT ABOUT THE FIFTH BACK BILLING OF “MARKET-BASED**
25 **RATES”?**

1 A. The fifth (and last) back-billing was sent with BellSouth's December 17,
2 2003 billings, and covered 2/17/03 through 9/16/03. This fifth back-billing
3 occurred under the Current Agreement, which provides in Section 2.1 of
4 Attachment 7, that IDS will report billing disputes using BellSouth's BAR Form.
5 (See Exhibit No._____(RR/EF-8), at page 3 of 4, to our Joint Direct Testimony).

6 A summary of BellSouth's fifth back-billing was attached to our prior Joint
7 Testimony as Exhibit No._____(RR/EF-5). In accordance with the Current
8 Agreement, IDS properly disputed this back-billing using BellSouth's BAR forms.
9 (See Exhibit No._____(RR/EF-6) to our Direct Testimony at pages 30, 31 and
10 32). All three BAR forms reference an attached spreadsheet listing the details of
11 the dispute. Provided with this testimony on the CD-ROM previously referenced
12 is a directory identified as Exhibit No._____(RR/EF-12). Electronic Exhibit
13 No._____(RR/EF-12) contains three Microsoft Excel Spreadsheets (one for each
14 Florida UNE "Q" Account) which detail the fifth back-billing dispute (December
15 2003). The line-by-line detailed information in these spreadsheets was provided
16 to BellSouth with the BAR forms. Thus, for this fifth back-billing, IDS provided
17 BellSouth not only the proper BAR forms, but detailed line-by-line dispute
18 information for each disputed charge.

19

20 **Q. DID IDS ALSO CORRESPOND WITH BELLSOUTH REGARDING THE**
21 **DISPUTED FIFTH BACK BILLING?**

22 A. Yes. IDS corresponded with BellSouth via e-mail on these disputes and
23 even escalated the disputes through higher management. In the process, IDS

1 provided BellSouth not only the proper BAR forms, but all of the information in
2 electronic Exhibit No._____(RR/EF-12). Thus IDS properly raised this dispute in
3 accordance with the Current Agreement.

4

5 **Q. ON PAGE 10 OF MS. BLAKE'S DIRECT TESTIMONY, SHE**
6 **CONTENDS THAT IDS DID NOT PRESENT EVIDENCE BELLSOUTH**
7 **EVIDENCE TO SUPPORT ITS DISPUTES. IS SHE CORRECT?**

8 A. No. This statement is both misleading and untrue. First, the manner in
9 which IDS raised all of its disputes fulfilled the requirements of both the Prior
10 Agreement and Current Agreement. For BellSouth's first three back-billings of
11 "market-based rates", BellSouth failed to provide any detail or back-up support
12 as required by the CABS J-Bills format used in UNE billing. The sum total of the
13 information BellSouth provided on these three back-billings was attached to our
14 Joint Direct Testimony in Exhibit No._____(RR/EF-3), at pages 2 through 14.
15 Because BellSouth simply provided IDS a one-line entry that purported to be a
16 total back-billing of thousands of end-user lines and other unidentified charges,
17 all IDS could do was dispute the method of the back-billings and demand detail
18 of the charges from BellSouth. For reasons known only to BellSouth, it has
19 never provided IDS *any* back-up or supporting information for these back-billings;
20 thus making it impossible to determine their accuracy. With respect to the fourth
21 and fifth back-billings, IDS provided BellSouth not only an explanation on the
22 BAR Forms, but further detail information as previously explained. Not only did

1 IDS provide what was required under the interconnection agreements, but it went
2 further in providing BellSouth information regarding the disputes.

3

4 **Q. ON PAGE 9 OF MS. BLAKE'S DIRECT TESTIMONY SHE CONTENDS**
5 **THAT BELLSOUTH PROPERLY RENDERED BILLS TO IDS FOR "MARKET-**
6 **BASED RATES" IN ACCORDANCE WITH THE PARTIES' INTECONNECTION**
7 **AGREEMENT. DO YOU AGREE?**

8 A. No. Both the Prior Agreement and Current Agreement contain language
9 in Section 1.1 of Attachment 7, which describes how BellSouth shall render bills
10 to IDS. Although the language of each agreement is slightly different, both
11 require all of BellSouth's billings to be in standard CABS (Carrier Access Billing
12 System) or CRIS (Customer Records Information System) billing, depending
13 upon the particular type of service provided. None of BellSouth's back-billings of
14 "market-based rates" complied with these requirements

15

16 **Q. DOES BELLSOUTH PROVIDE A BILLING GUIDE FOR CLECS TO**
17 **UNDERSTAND THE CRIS AND CABS BILLING SYSTEMS?**

18 A. Yes. BellSouth makes its "BellSouth Billing Guide" available to CLECs on
19 its Interconnection Services Website. Portions of the current BellSouth Billing
20 Guide are attached to this testimony as Exhibit No. _____(RR/EF-13). The
21 revision dates at the bottom of each page indicate that each section was in effect
22 prior to all of the BellSouth "market-based rate" back-billings in this docket. The
23 four sections attached describe how BellSouth is to bill UNE Port/Loop

1 Combinations, and are as follows: (a) Chapter I, Section 4 – How to read this
2 Guide; (b) Chapter II, Section 1 – Billing Accounts; (c) Chapter III, Section 1 –
3 Billing Formatting Overview; and (d) Chapter III, Section 4 – J and N Bill Layout.
4 Additionally, both the Prior Agreement and Current Agreement provide that
5 BellSouth business practices, which do not require an amendment, may be
6 posted and changed from time to time on BellSouth’s website (see Paragraph
7 22.3 of the General Terms and Conditions of the Prior Agreement – Exhibit
8 No.__(RR/EF-14); and Paragraph 20.3 of the General Terms and Conditions of
9 the Current Agreement – Exhibit No.__(RR/EF-15)).

10

11 **Q. PLEASE DESCRIBE THE FIRST TWO SECTIONS OF THE ATTACHED**
12 **BILLING GUIDE.**

13 A. The first section attached states, in part, on page I.4.1 that: *BellSouth*
14 *developed this document to assist those CLECs unfamiliar with the current*
15 *business processes used at BellSouth.”*

16 The second section attached provides, at page II.1.2, that a master “Q”
17 Account will be set up for each Revenue Accounting Office (RAO) and each type
18 of service provide to the CLEC. That page then provides a summary table of the
19 structure of each Q Account, which states in reference to service through UNE
20 Ports and Port/Loop Combinations, that the applicable BellSouth bill type will be
21 the BellSouth “UNE J Bill.” All of the “market-based rates” in dispute in this
22 docket involve recurring charges for port/loop UNE combinations, and non-
23 recurring charges associated with those port/loop UNE combinations. Therefore,

1 the proper billing format for all “market-based rate” billings should be BellSouth’s
2 UNE J Bills

3
4 **Q. WHAT DOES THE THIRD ATTACHED SECTION OF THE GUIDE**
5 **PROVIDE?**

6 **A.** The third section attached provideS, at page III.1.2, that: *“The ‘J’ and ‘N’*
7 *bills are specific CABS bill formats used to bill UNE ports, Port/Loop combos,*
8 *and non-design loops. These two bills follows CABS Billing Output*
9 *Specifications (CBOS) standards.”* That page continues by saying: *“The ‘J’*
10 *account bill provides a bill and CSR to the CLEC for purposes of billing all UNE*
11 *Port and Port/Loop combinations.”* Therefore, under both the Prior Agreement
12 and Current Agreement, all “market-based rate” billings should have been in the
13 CABS UNE J Bill format.

14
15 **Q. DESCRIBE THE LAST SECTION OF THE BILLING GUIDE.**

16 **A.** The fourth and final section of the Billing Guide attached provides
17 (Chapter III, Section 4 – J and N Bill Layout) (pages III.4.1 through III.4.32) a
18 listing of all information required on UNE CABS bills, together with examples of
19 UNE J Bills and UNE N Bills. What is clear from this portion of the BellSouth
20 Billing Guide is that all UNE J Bills are to have various sections, including a
21 detailed usage section (see page III.4.2) and a Customer Service Record (CSR)
22 for each end-user telephone number, that specifically identifies the USOCs
23 (Universal Service Ordering Codes), corresponding charges and usage dates for

1 each and every item being billed (see pages III.4.25 to III.4.29). What is also
2 clear is that the OC&C (Other Charges and Credits) section of the CABS bills is
3 only to be used for non-recurring charges and credits; and even OC&C items are
4 to be listed separately by each USOC, together with the purchase order numbers
5 (PON), applicable charges for each item, dates, and other relevant required
6 information (see page III.4.10).

7

8 **Q. DID THE FIRST THREE BACK BILLINGS CONTAIN ANY OF THE**
9 **INFORMATION FROM THE BILLING GUIDE YOU HAVE DESCRIBED?**

10 A. No. The first three back-billings of “market-based rates” contained none of
11 the above required information. There were no USOCs, no end-user telephone
12 numbers, no CSRs, no PONs and no detail charges or dates. In short, BellSouth
13 simply provided a one-line item that purported to summarize thousands of end-
14 user telephone numbers, PONs, USOCs, individual charges and dates, without a
15 single item of back-up detail or any other information required by the CABS UNE
16 J Bill. Ms. Blake’s claim that BellSouth billed the “Market-Based Rates” in the
17 OC&C section of the bills is clearly improper because most of the charges are for
18 recurring port/loop combinations (such as monthly charges), and do not belong in
19 the OC&C section. Moreover, any associated non-recurring charges (such as for
20 converting a customer to IDS) were never listed, since BellSouth failed to provide
21 IDS a single item of detail. In sum, Ms. Blake Direct Testimony virtually admits
22 that BellSouth’s first three back-billings failed to comply with either of the parties’
23 interconnection agreements. Thus, the first three back-billings, which total

1 \$407,392.18 and were billed with only the mere 13 pages reflected in Exhibit
2 No._____(RR/EF-3), were not billed in accordance with CABS UNE J Bill
3 standards as required by the Prior Agreement.
4

5 **Q. WHAT DO IDS' COST-BASED UNE BILLS CURRENTLY LOOK LIKE?**

6 A. Every month IDS receives CABS UNE J Bills in which the cost-based
7 rates are billed for all IDS customers. Those bills are literally thousands of pages
8 in length and provide detail USOCs, usage and other information for each and
9 every IDS' customer telephone number. This is how UNE Port/Loop
10 Combinations are supposed to be billed -- in a manner that allows the CLEC to
11 audit the bill and allocate and apportion the applicable BellSouth charges to each
12 and every IDS customer. Because BellSouth's first three "market-based rate"
13 back-billings failed to provide *any* of the required information, at a minimum, IDS
14 should not be required to pay those bills until BellSouth provides the detailed
15 information required under the CABS UNE J Billing standard to enable IDS to
16 verify and audit the validity of the bills.
17

18 **Q. WERE THE MAY 2003 AND DECEMBER 2003 BACK BILLINGS (THE**
19 **LAST TWO BACK BILLS) MADE IN ACCORDANCE WITH THE CABS UNE J**
20 **BILL STANDARDS?**

21 A. No. These back-billings also did not comply with CABS UNE J Bill
22 standards. Provided with this testimony on the CD-ROM previously referenced,
23 are two directories identified as Exhibit No._____(RR/EF-16) and Exhibit

1 No._____(RR/EF-17). These two directories contain exact copies of BellSouth's
2 May 2003 and December 2003 back-billings; with Exhibit No._____(RR/EF-14)
3 containing BellSouth's May 2003 back-billing and Exhibit No._____(RR/EF-15)
4 containing BellSouth's December 2003 back-billing. As is clear from the files
5 provided in those two electronic exhibits, the back-billing was provided in data
6 files with instructions in Microsoft Word. None of this back-billing was in the
7 required CABS format. But at least, detailed billing information was provided in
8 the data files so that IDS could audit the bills. It is from electronic Exhibit
9 No._____(RR/EF-16) and Exhibit No._____(RR/EF-17), that IDS was able to
10 create the detailed information shown in electronic Exhibit No._____(RR/EF-11)
11 and Exhibit No._____(RR/EF-12).

12

13 **Q. HASN' T BELLSOUTH'S BILLING SYSTEM BEEN EVOLVING?**

14 **A.** That may be what BellSouth claims. However, the notations to the rate
15 sheets purport to claim that *for at least the last three years*, BellSouth has been
16 working on "*developing the billing capability to mechanically bill*" the "market-
17 based rates." As indicated in the BellSouth Billing Guide, both the Prior
18 Agreement and Current Agreement require all such billing (including back-
19 billings) to be in CABS UNE J Bill format. To date, BellSouth has yet to provide
20 IDS with mechanized billing of the "Market-Based Rates", and/or billing of such
21 charges in the required CABS UNE J Bill format. BellSouth's back-billing of
22 "market-based rates" is much like the Call Flow #12 DUF dispute which involves

1 another billing error that BellSouth has known about for at least three years, but
2 apparently has done nothing to fix.

3

4 **Q. DOES MS. BLAKE'S DIRECT TESTIMONY ON CABS BILLING**
5 **CONTRADICT BELLSOUTH'S POSITION WHEN IDS RENDERS CABS BILLS**
6 **TO BELLSOUTH?**

7 A. Yes. Ms. Blake's Direct Testimony contradicts BellSouth's position on
8 those CABS bills which IDS sends to BellSouth. Both interconnection
9 agreements provide in Section 1.1.1 of Attachment 7 (Exhibit No._____(RR/EF-
10 7) and No._____(RR/EF-8) to our Direct Testimony) that IDS will bill BellSouth in
11 CABS format for all services that IDS provides BellSouth. In the past, IDS has
12 rendered bills to BellSouth for reciprocal compensation and other services. On
13 each occasion, BellSouth refuses to pay any bill unless and until detailed call and
14 billing records are provided. Had IDS rendered to BellSouth bills that contained
15 no detail information, such as BellSouth's first three back-billings to IDS,
16 BellSouth would have refused to pay any of those bills. BellSouth must be held
17 to this same standard. Thus, Ms. Blake's contention that BellSouth's billing
18 complies with the CABS billing standard contradicts BellSouth's own
19 interpretation of that same standard when IDS submits bills to BellSouth.

20

21

1 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

2 A. Yes.

3

4

5

UNBUNDLED NETWORK ELEMENTS
Florida

CATEGORY	NOTES	UNBUNDLED NETWORK ELEMENT	Interim	Zone	BCS	USOC	RATES (\$)					OSS RATES (\$)					
							Nonrecurring		Disconnect			SOMECD	SOMAN	SOMAN	SOMAN	SOMAN	SOMAN
							Rec	First	Addl	First	Addl						
		Line Side Combination Channelized PBX Trunk Port - Business			UEPPX	UEPCX	1.34	0	0	0	0		10.73			1.65	
		Line Side Outward Channelized PBX Trunk Port - Business			UEPPX	UEPOX	1.34	0	0	0	0		10.73			1.65	
		Line Side Inward Only Channelized PBX Trunk Port without DID			UEPPX	UEP1X	1.34	0	0	0	0		10.73			1.65	
		2-Wire Trunk Side Unbundled Channelized DID Trunk Port			UEPPX	UEPDM	8.81	0	0	0	0		10.73			1.65	
		Feature Activations - Unbundled Loop Concentration															
		Feature (Service) Activation for each Line Side Port Terminated in D4 Bank			UEPPX	1PQWM	0.66	25.4	13.41	3.96	3.93		10.73			1.65	
		Feature (Service) Activation for each Trunk Side Port Terminated in D4 Bank			UEPPX	1PQWU	0.66	78.16	18.42	56.03	10.95		10.73			1.65	
		Telephone Number/ Group Establishment Charges for DID Service															
		DID Trunk Termination (1 per Port)			UEPPX	NDT	0						10.73				
		Estab Trk Grp and Provide 1st 20 DID Nos. (FL, GA, NC, & SC)			UEPPX	NDZ	0	0	0	0	0		10.73				
		DID Numbers - groups of 20 - Valid all States			UEPPX	ND4	0	0	0	0	0		10.73				
		Non-Consecutive DID Numbers - per number			UEPPX	ND5	0	0	0	0	0		10.73				
		Reserve Non-Consecutive DID Numbers			UEPPX	ND6	0	0	0	0	0		10.73				
		Reserve DID Numbers			UEPPX	NDV	0	0	0	0	0		10.73				
		Local Number Portability															
		Local Number Portability - 1 per port			UEPPX	LNPCP	3.15	0	0								
		FEATURES - Vertical and Optional															
		Local Switching Features Offered with Line Side Ports Only															
		All Features Available			UEPPX	UEPVF	2.17	0	0				10.73			1.65	
		UNBUNDLED PORT LOOP COMBINATIONS - MARKET RATES															
		Market Rates shall apply where BellSouth is not required to provide unbundled local switching or switch ports per FCC and/or State Commission rules															
		These scenarios include:															
		1. Unbundled port/loop combinations that are Not Currently Combined in all of the BellSouth states except as noted for Georgia and Tennessee.															
		2. Unbundled port/loop combinations that are Currently Combined or Not Currently Combined in Zone 1 of the Top 8 MSAs in BellSouth's region for end users with 4 or more DS0 equivalent lines.															
		The Top 8 MSAs in BellSouth's region are: FL (Orlando, Ft. Lauderdale, Miami); GA (Atlanta); LA (New Orleans); NC (Greensboro-Winston Salem-Highpoint/Charlotte-Gastonia-Rock Hill); TN (Nashville).															
		BellSouth currently is developing the billing capability to mechanically bill the recurring unbundled port Market Rates in this section as well as the nonrecurring Market Rates in this section for Currently Combined port/loop combinations in Zone 1 of the Top 8 MSAs in BellSouth's region for end users with 4 or more DS0 equivalent lines. In the interim, BellSouth shall bill the rates in the Cost-Based section preceding in lieu of such Market Rates and reserves the right to true-up the billing difference.															
		The Market Rate for unbundled ports includes all available features in all states.															
		End Office and Tandem Switching Usage and Common Transport Usage rates in the Port section of this rate exhibit shall apply to all combinations of loop/port network elements except for UNE Coin Port/Loop Combinations which have a flat rate usage charge (USOC: URECU)															

AMENDMENT
TO THE
AGREEMENT BETWEEN
IDS TELCOM, L.L.C.
AND
BELLSOUTH TELECOMMUNICATIONS, INC.
DATED FEBRUARY 5, 2003

Pursuant to this Amendment, (the "Amendment"), IDS Telcom, L.L.C. ("IDS Telcom"), and BellSouth Telecommunications, Inc. ("BellSouth"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Interconnection Agreement between the Parties dated February 5, 2003 ("Agreement") to be effective on the date of the last signature executing the Amendment.

WHEREAS, BellSouth and IDS Telcom, entered into the Agreement on February 5, 2003, and;

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby covenant and agree as follows:

1. The Parties agree to delete for Florida the Notes for Unbundled Port Loop Combinations - Market Rates in Exhibit B of Attachment 2 and replace with the Notes reflected in Exhibit 1 of this Amendment, attached hereto and incorporated herein by this reference.
2. All of the other provisions of the Agreement, dated February 5, 2003, shall remain in full force and effect.
3. Either or both of the Parties is authorized to submit this Amendment to the respective state regulatory authorities for approval subject to Section 252(e) of the Federal Telecommunications Act of 1996.

IN WITNESS WHEREOF, the Parties hereto have caused this Amendment to be executed by their respective duly authorized representatives on the date indicated below.

IDS Telcom, L.L.C.

By:  _____

Name: Robert Hacker

Title: CFO

Date: 4/1/03

BellSouth Telecommunications, Inc.

By:  _____

Name: Elizabeth R. A. Shirishi

Title: Director

Date: 4-10-03

EXHIBIT 1

UNBUNDLED NETWORK ELEMENTS - Florida						Attachment: 2		Exhibit: B								
CATEGORY	RATE ELEMENTS	Interm	Zone	BCS	USOC	RATES (\$)	Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Incremental Charge - Manual Svc Order vs. Electronic-1st	Incremental Charge - Manual Svc Order vs. Electronic-Add'l	Incremental Charge - Manual Svc Order vs. Electronic-Disc 1st	Incremental Charge - Manual Svc Order vs. Electronic-Disc Add'l				
							Rec	Nonrecurring		Nonrecurring Disconnect		OSS Rates(\$)				
							First	Add'l	First	Add'l	SOMEC	SOMAN	SOMAN	SOMAN	SOMAN	SOMAN
UNBUNDLED PORT LOOP COMBINATIONS - MARKET RATES																
Market Rates shall apply where BellSouth is not required to provide unbundled local switching or switch ports per FCC and/or State Commission rules.																
This includes:																
Unbundled port/loop combinations that are Currently Combined or Not Currently Combined in Zone 1 of the Top 8 MSAs in BellSouth's region for end users with 4 or more DS0 equivalent lines.																
The Top 8 MSAs in BellSouth's region are: FL (Orlando, Ft. Lauderdale, Miami); GA (Atlanta); LA (New Orleans); NC (Greensboro-Winston Salem-Highpoint/Charlotte-Gastonia-Rock Hill); TN (Nashville).																
BellSouth currently is developing the billing capability to mechanically bill the recurring and non-recurring Market Rates in this section except for nonrecurring charges for not currently combined in FL and NC. In the interim where BellSouth cannot bill Market Rates, BellSouth shall bill the rates in the Cost-Based section preceding in lieu of the Market Rates and reserves the right to true-up the billing difference.																
The Market Rate for unbundled ports includes all available features in all states.																
End Office and Tandem Switching Usage and Common Transport Usage rates in the Port section of this rate exhibit shall apply to all combinations of loop/port network elements except for UNE Coin Port/Loop Combinations which have a flat rate usage charge (USOC: URECU).																
For Not Currently Combined scenarios the Nonrecurring charges are listed in the First and Additional NRC columns for each Port USOC. For Currently Combined scenarios, the Nonrecurring charges are listed in the NRC - Currently Combined section. Additional NRCs may apply also and are categorized accordingly.																

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**How to Read
this Guide**

BellSouth developed this document to assist those CLECs unfamiliar with the current business processes used at BellSouth. A recommended approach is that the CLEC initially read this guide from start to finish; however, the guide is structured so that a CLEC may easily access a particular section without having to read a preceding section.

The guide is organized as follows:

- Introduction
- Billing Overview
- Bill Formatting
- Electronic Daily Usage Files
- Billing Terminology
- Frequently Asked Questions

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**Billing Accounts
Overview**

Before the CLEC orders Unbundled Network Elements (UNE) Port/loop combos, non-design loops, resale, local or interim number portability services, the CLEC is required to establish one or more master billing account(s) with BellSouth.

The process to establish a Master Billing Account (Q Account) with BellSouth is the following:

- For information concerning initial setup, the CLEC should reference the following document:
http://www.interconnection.bellsouth.com/become_a_clec/index.html or contact the Advisory Team. For subsequent setup, the CLEC may contact the Advisory Team or Local Contract Manager. If additional information is needed, the BellSouth Start-Up Guide should be referenced at http://www.interconnection.bellsouth.com/guides/html/clec_ar.html
- These accounts are identified as Q accounts in CRIS; the account number includes a 'Q' in the fourth position of the account number, i.e., 205 Q92-1000-100. All master UNE CLEC accounts will have a Q account number in the range of Q59 or Q80-Q98.
- Multiple Q accounts will be established based on the type of services the CLEC orders from BellSouth.
- After the appropriate master Q account(s) is established, notification is sent to BellSouth Billing Inc. (BBI) to establish the account information in the BellSouth CLEC database.

All the master Q accounts are identified by type of business. The mechanization systems within the LCSC will access a database that contains specific billing information by Operating Company Number (OCN) to validate billing account numbers on the Local Service Request (LSR) received from the customer for UNE services, i.e., ports/loops. If the Q account is not in the database, the service order for the port/loop will not process, and an error will be generated to the service representative.

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Q Account Structure

Only one Q account (Master Billing Account) per Revenue Accounting Office (RAO) per CLEC for the following services can be established:

- Resale
- Local Number Portability
- Interim Number Portability
- UNE Loops (non-designed - SL1)
- UNE Port/Loop Combos

The following table summarizes the structure for the Q accounts:

Type of Services Billed	Class of Service on Q Account	Bill Type
Resale	1FB	Resale CRIS Bill
Interim Number Portability (INP)	1FB	INP UNE CRIS Bill
Local Number Portability (LNP) and other services not listed	1FB	LNP UNE CRIS Bill
UNE Loops - Non design	UEANL	UNE N Bill
UNE Ports or Port/Loop Combos	UEPBX	UNE J Bill

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Q Account Structure (Continued)

The following table presents the different BellSouth RAOs:

BellSouth Site
Alabama
Kentucky
Louisiana
Mississippi
Tennessee
Atlanta, GA
Macon, GA
Jacksonville, FL
Ft. Lauderdale, FL
Miami, FL
North Carolina
South Carolina

CABS Account Structure

When a facility-based CLEC orders local interconnection or design loops, the CLEC must place an order for switched access service (FGD) or facility service. The account numbers will be in the following format: NPA NXX LINE. The fourth character will represent switched local interconnection with an 'S' and an 'N' will represent design loops on a facility account. An 'A' will represent Line Information Database (LIDB) service or an ancillary account, and a 'C' will represent interim number portability on a miscellaneous account. The fifth and sixth characters will represent a possible billing period of 01, 04, 07, 10, 13, 16, 19, 22, 25, or 28.

The account number for a switched local interconnection account with a billing period on the fourth day of the month would be:

NPA S04 LINE

The following chart summarizes the structure for the CABS accounts:

Type of Service	Bill Type
Local Interconnection	Switched 'S'
Facility Services	Facility 'N'
Interim Number Portability	Miscellaneous 'C'
LIDB	Ancillary 'A'

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Bill Formatting Overview

This chapter covers the different types of bill formats and the delivery options offered by BellSouth.

The bills are formatted according to an industry standard:

- Carrier Access Billing System (CABS) or
- Customer-segment-specific Customer Record Information System (CRIS) presentation format.

CRIS produces the Customized Large User Bill (CLUB[®]) which includes the following billed services:

- Resale
- Unbundled Network Elements (UNE) – charges for ADUF/ODUF only.
- Local Number Portability Charges
- Interim Number Portability

CABS is used to bill customers for accessing the BellSouth network. The CABS bill types that are applicable for CLEC services include four different account types:

Account Type	Description
Ancillary (A)	Used to bill services including, but not limited to, the following: Inward Operator Services, Database Queries, SS7, and Link Access. Some services can have usage charges.
Miscellaneous (C)	Used for billing functions that do not fit into the other account types such as Local Number Portability. This account does not have usage charges.
Facility (N)	Used for billing Switched and Special Access Facilities. This account type does not have usage charges.
Switched (S)	Used for billing Switched Access usage, Trunks, and other related services. This account type has both usage and flat rate charges.

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**Bill Formatting
Overview
(Continued)**

A Customer Service Record (CSR) is associated with each account type.

The 'J' and 'N' bills are specific CABS bill formats used to bill UNE ports, Port/Loop combos, and non-design loops. These two bills follow the CABS Billing Output Specifications (CBOS) standards.

The 'J' account bill provides a bill and CSR to the CLEC for purposes of billing all UNE Port and Port/Loop combinations. The CLEC will receive one bill per Revenue Accounting Office (RAO) for all charges.

The 'N' account bill is used to bill stand-alone non-design loop services. The CLEC will receive one bill per RAO.

This chapter covers the different types of billing formats available for BellSouth's CRIS and CABS bills.

The CLUBSM Bill – Bill Layout, CABS Bill – Bill Layout, J Bill – Bill Layout, and N Bill – Bill Layout sections in this chapter describe in detail the layout and information presented in each type of bill.

The CRIS Bill Options and the CABS Bill Options sections describe in detail each available format and provide information on testing procedures and contracting. These sections also explain the different delivery options and provide a comparison among all available options stating the advantages and disadvantages of each.

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**J and N Bills -
Overview**

J and N bills are specific bill formats that are used to bill UNE ports, port loop combos and non-design loops.

**J and N
Billing Period**

J and N bills are produced on the CRIS bill periods. There are 20 CRIS billing periods.

The following billing periods occur on the following days of the month:

- First
- Second
- Fourth
- Fifth
- Seventh
- Eighth
- Tenth
- Eleventh
- Thirteenth
- Fourteenth
- Sixteenth
- Seventeenth
- Nineteenth
- Twentieth
- Twenty-second
- Twenty-third
- Twenty-fifth
- Twenty-sixth
- Twenty-eighth
- Twenty-ninth

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**UNE CABS
Bills
Section
Overview**

The following is a list of all the sections which apply to the UNE CABS bills.

Section	Description	Bill Types
Remittance Page	<ul style="list-style-type: none"> The page the customer mails along with its payments to the Payment Remittance Office (PRO) for processing. It contains the Total Amount Due and Due by Date. 	Applies to all bill types.
Summary of Access Charges	<ul style="list-style-type: none"> The following section gives a summary of the charges contained in the bill. 	Applies to both J & N bills.
Payment Section	<ul style="list-style-type: none"> Details all payments that have been received since the last billing period. 	Applies to both J & N bills.
Adjustment Section	<ul style="list-style-type: none"> The section of the bill that lists all adjustments, credits, and debits which have been applied since the last billing period. 	Applies to both J & N bills.
Balance Due	<ul style="list-style-type: none"> The following section of the bill contains the total balance due for the billing cycle. 	Applies to both J & N bills.
Late Payment Section	<ul style="list-style-type: none"> Calculates the late payment fees that are due on this billing period. 	Applies to both J & N bills.
Other Charges and Credits (OC&C) Section	<ul style="list-style-type: none"> Includes all service order related and manual OC&Cs that have been produced since the last billing period. 	Applies to both J & N bills.
Usage Section	<ul style="list-style-type: none"> Gives a detailed view of the usage that was processed for an EO. The bill page takes the minutes of use or messages depending on the type of traffic and applies the rate elements. The Summary of Usage Charges summarizes by rate elements the quantity and revenue for that EO. 	Applies to J bill.

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Section	Description	Bill Types
Facility Access Circuit Listing	<ul style="list-style-type: none"> This section shows the total monthly usage charges for all the circuits that the customer ordered, broken out by circuit ID. The corresponding detail associated with this information can be found on the accompanied CSR. 	Applies to N Bill
Detail of Taxes Section	<ul style="list-style-type: none"> Gives the details of all taxes, which apply to the bill. 	Applies to both J & N bills.
Bill Index	<ul style="list-style-type: none"> Gives an index of the bill by page number. 	Applies to all bill types however the format and content can be specific to the bill type.

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**Sections Common
To Both J and
N Bills**

The following sections are common to both the J and N bills.

- Remittance Page
- Summary of Charges - Determine the description and location
- Payments and Adjustments
- Balance Due
- Late Payment
- Other Charges and Credits
- Taxes

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Remittance Page

This is the page the customer mails along with its payments to the Payment Remittance Office (PRO) for processing. It contains the following sections:

1. Total Amount Due – This is the total outstanding balance as of the latest billing cycle.
2. Return Address – This is PRO office to which the payment is mailed.
3. Correspondence Address – This is the address to send the correspondence.



BILL NO 305 Q82-NNNN NNN
BILL DATE APR 22, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.

<CUSTOMER NAME>
<ADDRESS>
<CITY> <STATE> <ZIP CODE>

RETURN DOCUMENT

BILLING INQUIRIES CALL (800) 721-8127 TELCO USE: MAIL GROUP 1

BALANCE DUE BY INVOICE - PLEASE INDICATE AMOUNT REMITTED FOR EACH INVOICE

INVOICE NUMBER	AMOUNT DUE	AMOUNT REMITTED
Due by May 2 305 Q82NNNNNNN-NNNNN N	9,999.99	
TOTAL AMOUNT DUE.....	9,999.99	

TO ENSURE PROPER CREDIT AND AVOID POSSIBLE LATE PAYMENT PENALTIES, PLEASE COMPLETE AND RETURN THIS DOCUMENT WITH YOUR PAYMENT TO:

1

BELLSOUTH PRO - CLUB
P.O. BOX 33009
CHARLOTTE, NC
28243 -0001

2

PLEASE SEND ALL OTHER CORRESPONDENCE TO:

ICS - LOCAL BILLING - BHM
600 N. 19TH STREET - 12C1
BIRMINGHAM, AL 35203

3

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**Summary
Page**

The following section gives a summary of the charges contained in the bill. Some of the unique features of this section include:

1. Bill Number – The bill number for the J Bill contains the Q account billing account number.
2. Balance Due - This line shows the balance outstanding on the account, net of any payments that have been received during the billing cycle.
3. Late Payments – This line contains the late payment charges that have been applied to the account.
4. Total Current Charges – This line contains the total charges for the current billing cycle.
5. Total Amount Due – This is the sum of – (Balance Due + Late Payment + Total Current Charges).

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Payments and Adjustments

The following sections of the bill contain the payments and adjustments that have been applied to the bill.

BILL NO	615 QNN-NNNN NNN
INVOICE NO	615QNNNNNNN-NNNNN
BILL DATE	APR 22,2000
OCN NNNN	PAGE 2

* * * DETAIL OF PAYMENTS APPLIED * * *

INVOICE NO 615QNNNNNNN-NNNNN	
APR 24 00 CASH PAYMENT	9,889.18CR
<hr style="border-top: 1px dashed black;"/>	
TOTAL PAYMENTS APPLIED	9,889.18CR

Balance Due

The following section of the bill contains the total balance due for the billing cycle.

BILL NO	615 QNN-NNNN NNN
INVOICE NO	615QNNNNNNN-NNNNN
BILL DATE	APR 22,2000
OCN NNNN	PAGE 3

* * * DETAIL OF BALANCE DUE * * *

INVOICE NO 615QNNNNNNN-NNNNN	
PREVIOUS BALANCE	9,889.18
PAYMENTS APPLIED	9,889.18CR
<hr style="border-top: 1px dashed black;"/>	
BALANCE DUE	0.00
TOTAL BALANCE DUE	0.00

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Late Payments Section

The following section details the late payments that have been applied to the bill

BILL NO	904 QNN-NNNN NNN
INVOICE NO	904QNNNNNNN-00102
BILL DATE	APR 11,2000
OCN NNNN	PAGE 4
* * * DETAIL OF LATE PAYMENT CHARGES * * *	
LATE PAYMENT CHARGE BASE AMOUNT	6,775.47
LOCAL	
02/11/00-03/10/00 - 28 DAYS	6,775.47
	110.63
TOTAL LATE PAYMENT CHARGE FOR BASE AMOUNT	110.63

TOTAL LATE PAYMENT CHARGES	110.63

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**Other Charges
and Credits
Section**

The following details the non-recurring charges and credits that have been applied to the bill.

1. Service Order Number – This is a system-generated, up to 12 character, alphanumeric indicator that appears on the first line of the group of OC&Cs associated with a service order.
2. Purchase Order Number (PON) – This is a customer-generated, up to 16 character alphanumeric indicator, that appears on the first line of the OC&C grouping. It is used to identify the customer's unique purchase order or requisition number that authorizes the issuance of this request or supplement. If the service order activity is BellSouth generated, the Purchase Order field will not be populated.
3. Telephone Number – This service order is related to this master Q account, BTN number and occurred on the earning telephone number.
4. USOC - This is up to a five-character alphanumeric code that is used to identify a particular service or equipment offered under tariff and or contract. These USOC codes appear along with a description of the service.
5. Net Effect – This shows how this OC&C affected the customer monetarily, by fractional and or one-time charges. It also reflects the total billing for this OC&C grouping.
6. State Total – This line shows the total service OC&C activity broken out by state.

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Other Charges
and Credits
Section
(Continued)

BILL NO 615 QNN-NNNN NNN
INVOICE NO 615QNNNNNNN-NNNNN
BILL DATE APR 22,2000
OCN NNNN PAGE 4

*** DETAIL OF OTHER CHARGES AND CREDITS ***

	BIP	AMOUNT
1		
3	MAR 24 00 SO C NNNNNNNN	PON LW2318
4	TELEPHONE NUMBER BTN615QNNNNNNNEARNING TNNNNNNNNNNN	
	ONE TIME CHARGE FOR MISCELLANEOUS ACTIVITY	
	FROM MAR 25 00 THRU APR 21 00	
	LNPCX 1 FCC LOCAL NUMBER PORTABILITY LINE CHARGE - LI	
	NE	
	LOCAL - TN - EC 5185	0.33
	ONE TIME CHARGE FOR MISCELLANEOUS ACTIVITY	
	FROM MAR 25 00 THRU APR 21 00	
	UEG2M 1 PROFESSIONAL SERVICE FEE, BUSINESS ZONE 3	
	LOCAL - TN - EC 5185	18.95
	ONE TIME CHARGE FOR MISCELLANEOUS ACTIVITY	
	FROM MAR 25 00 THRU APR 21 00	
	UEPBL 1 UNBUNDLED EXCHANGE PORT, BUSINESS, MEASURED	
	LOCAL - TN - EC 5185	6.39
	ONE TIME CHARGE FOR MISCELLANEOUS ACTIVITY	
	FROM MAR 25 00 THRU APR 21 00	
	UEPLX 1 UNBUNDLED LOOP VOICE GRADE	
	LOCAL - TN - EC 5185	16.80
	ONE TIME CHARGE FOR MISCELLANEOUS ACTIVITY	
	FROM MAR 24 00 THRU APR 22 00	
	UEPBL 1 UNBUNDLED EXCHANGE PORT, BUSINESS, MEASURED	
	LOCAL - TN - EC 5185	41.50
	ONE TIME CHARGE FOR MISCELLANEOUS ACTIVITY	
	FROM MAR 24 00 THRU APR 22 00	
5	SOMEC 1 CLEC SERVICE REQUEST PROCESSING, PER MECHANIZ	
	ED LSR	
	LOCAL - TN - EC 5185	7.45
	NET EFFECT OF SO C NNNNNNNN	PON NNNNNN
	PER MONTH FRACTIONAL ONE-TIME BILLED AMOUNT	
	TOTAL - TN - EC 5185	
	0.00 42.47 48.95 91.42	
	APR 14 00 SO C NNNNNNNN	PON NNNNNNNNNNNNNNNNN
	TELEPHONE NUMBER BTN615QNNNNNNNEARNING TNNNNNNNNNNN	
	ONE TIME CHARGE FOR MISCELLANEOUS ACTIVITY	
	FROM APR 14 00 THRU APR 22 00	
	SOMEC 1 CLEC SERVICE REQUEST PROCESSING, PER MECHANIZ	
	ED LSR	
	LOCAL - TN - EC 5185	7.45
	NET EFFECT OF SO C NNNNNNNN	PON NNNNNNNNNNNNNNNNN
	PER MONTH FRACTIONAL ONE-TIME BILLED AMOUNT	
6	TOTAL - TN - EC 5185	
	0.00 0.00 7.45 7.45	
	TOTAL OTHER CHARGES AND CREDITS	
	TOTAL - TN - EC 5185	12,445.80CF

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Detail of Taxes This section shows the taxes for the billing period by state.

BILL NO 615 QNN-NNNN NNN INVOICE NO 615QNNNNNN-NNNNN BILL DATE APR 22, 2000 OCN NNNN PAGE 146				
TOTAL - TENNESSEE - 5185				
* * * DETAIL OF TAXES * * *				
TYPE	MONTHLY ACCESS	USAGE	OTHER	TOTAL
FRANCHISE	9.82	0.00	0.00	9.82
TOTAL	9.82	0.00	0.00	9.82

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J Bill

Overview

The J bill is a particular type of bill format that is primarily used for customers that use specific products such as UNE ports and Port/Loop combos and as a result will only contain local usage.

Some of the exceptions of the J bill include

- Usage Section
- Bill Index

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Usage Section The following section details the local usage for the billing cycle by end office.

1. Local Usage – Only local usage appears on the J Bill.
2. Date Range – This shows the “from” and “through” dates for which the usage was recorded. Normally this is the billing period date ranges.
3. Rate Category – Within this column is a description of the rate elements that apply.
4. Quantity – This column shows the messages that apply to this jurisdiction.

		BILL NO	615 QNN-NNNN NNN	
		INVOICE NO	615QNNNNNNN-NNNNN	
		BILL DATE	APR 22,2000	
		OCN NNNN	PAGE 45	
***** LOCAL USAGE FOR OFFICE CHTGTNBRDSO *****				
FEB 22 00 THRU MAR 21 00				
3	4	RATE CATEGORY	QUANTITY	AMOUNT
		UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185		
		LOCAL		
		UNDETERMINED ROUTING		
		ORIGINATING		
		CHTGTNDTDS0 - 005 MILES	2	.000010100 .01
		CHTGTNNSDS1 - 008 MILES	26	.000010100 .01
		CHTGTNRODS0 - 007 MILES	5	.000010100 .01
		CHTGTN09CM1 - 008 MILES	1	.000010100 .01
		TOTAL UT SHRD TRANS	34	.04
		UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185		
		LOCAL		
		UNDETERMINED ROUTING		
		ORIGINATING	32	.000459300 .01
		TOTAL UT F TERM EO-EC	32	.01
		UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185		
		LOCAL		
		UNDETERMINED ROUTING		
		ORIGINATING	32	.000784900 .03
		TOTAL UT TANDEM SW	32	.03
		UNBUNDLED TRANSPORT TANDEM SWITCHING - TRUNK PORT - TN - EC 5185		
		LOCAL		
		UNDETERMINED ROUTING		
		ORIGINATING		
		EO	32	.000333100 .01
		TEC	32	.000333100 .01
		TOTAL UT TS TRUNK PORT	64	.02
		TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185		.10

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Detail of Usage
(Continued)

RATE CATEGORY	QUANTITY	RATE	AMOUNT
BILL NO 615 QNN-NNNN NNN INVOICE NO 615QNNNNNNN-NNNNN BILL DATE APR 22,2000 OCN NNNN PAGE 46			
* * * * * LOCAL USAGE FOR OFFICE CHTGTNBRDS0 * * * * * FEB 22 00 THRU MAR 21 00			
INTERSWITCH			
INITIAL	4	.002102500	.01
ADDITIONAL	29	.002102500	.06
TEC			
SINGLE NETWORK			
INTERSWITCH			
INITIAL	4	.002102500	.01
ADDITIONAL	29	.002102500	.06
ACCESS			
TERMINATING			
TEO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	1	.002102500	.01
	-----		-----
TOTAL ULS - SWITCH FUNC	68		.16
UNBUNDLED LOCAL SWITCHING TRUNK PORT			
LOCAL			
ORIGINATING			
EC			
SINGLE NETWORK			
INTERSWITCH	32	.000228700	.01
TEC			
SINGLE NETWORK			
INTERSWITCH	32	.000228700	.01
	-----		-----
TOTAL ULS - TRUNK PORT	64		.02
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 518518

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Detail of Usage
(Continued)

		BILL NO	615 QNN-NNNN NNN
		INVOICE NO	615QNNNNNN-NNNNN
		BILL DATE	APR 22,2000
		OCN NNNN	PAGE 47
***** LOCAL USAGE FOR OFFICE CHTGTNBRDS0 ***** MAR 22 00 THRU APR 21 00			
RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
CHGTNDTDS0 - 005 MILES	768	.000010100	.04
CHGTNGZCM1 - 002 MILES	53	.000010100	.01
CHGTNHTDS0 - 009 MILES	172	.000010100	.02
CHGTNKHCM1 - 008 MILES	16	.000010100	.01
CHGTNMACM0 - 008 MILES	22	.000010100	.01
CHGTNMVDS0 - 013 MILES	49	.000010100	.01
CHGTNNSCM0 - 008 MILES	21	.000010100	.01
CHGTNNSDS0 - 008 MILES	33	.000010100	.01
CHGTNNSDS1 - 008 MILES	6,656	.000010100	.54
CHGTNNSVMD - 008 MILES	14	.000010100	.01
CHGTNRBDS0 - 010 MILES	227	.000010100	.02
CHGTNRDS0 - 007 MILES	631	.000010100	.04
CHGTNSEDS0 - 009 MILES	42	.000010100	.01
CHGTNSMRS5 - 012 MILES	8	.000010100	.01
CHGTNVVDS0 - 001 MILES	171	.000010100	.01
CHGTN09CM1 - 008 MILES	194	.000010100	.02
CHGTN10CM0 - 007 MILES	15	.000010100	.01
CLEVTNMADS0 - 022 MILES	206	.000010100	.05
DCTRINMTRS5 - 042 MILES	81	.000010100	.03
DYTNMADS0 - 035 MILES	43	.000010100	.01
JSPRINMTDS0 - 026 MILES	13	.000010100	.01
SDDSTNMARS5 - 018 MILES	181	.000010100	.03
SPBGTNMARS0 - 031 MILES	401	.000010100	.13
SPCYTNMTRS0 - 051 MILES	44	.000010100	.02
ACCESS			
TANDEM			
ORIGINATING			
CHGTNNS84T - 008 MILES	658	.000010100	.05
TERMINATING			
CHGTNNS84T - 008 MILES	575	.000010100	.05
TOTAL UT SHRD TRANS		11,294	1.17
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	10,050	.000459300	4.62

CONTINUED

continued on next page

Detail of Usage
(Continued)

		BILL NO	615 QNN-NNNN NNN
		INVOICE NO	615QNNNNNNN-NNNNN
		BILL DATE	APR 22,2000
		OCN NNNN	PAGE 48
* * * * * LOCAL USAGE FOR OFFICE CHTGTNRDSD * * * * *			
MAR 22 00 THRU APR 21 00			
RATE CATEGORY	QUANTITY	RATE	AMOUNT
TOTAL UT F TERM EO-EO	10,050		4.62
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO TANDEM - TN - EC 5185			
LOCAL			
TANDEM			
ORIGINATING	364	.000459300	.17
ACCESS			
TANDEM			
ORIGINATING	658	.000459300	.30
TERMINATING	575	.000459300	.26
TOTAL UT F TERM EO-TAN	1,597		.73
UNBUNDLED TRANSPORT FACILITIES TERMINATION TOPS TO EO - TN - EC 5185			
LOCAL			
TANDEM			
ORIGINATING	1	.000459300	.01
TOTAL UT F TERM TOPS-EO	1		.01
UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	10,413	.000784900	8.17
ACCESS			
TANDEM			
ORIGINATING	658	.000784900	.52
TERMINATING	575	.000784900	.45
TOTAL UT TANDEM SW	11,646		9.14
UNBUNDLED TRANSPORT TANDEM SWITCHING - TRUNK PORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
EO	10,413	.000333100	3.47
TEO	10,050	.000333100	3.35
TANDEM			
ORIGINATING			
TEO	1	.000333100	.01

CONTINUEI

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Detail of Usage
(Continued)

RATE CATEGORY	QUANTITY	RATE	AMOUNT
BILL NO 615 QNN-NNNN NNN INVOICE NO 615QNNNNNN-NNNNN BILL DATE APR 22,2000 OCN NNNN PAGE 49			
* * * * * LOCAL USAGE FOR OFFICE CHGTNBRDS0 * * * * * MAR 22 00 THRU APR 21 00			
ACCESS			
TANDEM			
ORIGINATING			
EO	658	.000333100	.22
TERMINATING			
TEO	575	.000333100	.19
-----			-----
TOTAL UT TS TRUNK PORT	21,697		7.24
TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185			22.91
UNBUNDLED END OFFICE - TN - EC 5185			
UNBUNDLED LOCAL SWITCHING - SWITCHING FUNCTIONALITY			
LOCAL			
ORIGINATING			
EO			
SINGLE NETWORK			
INTRASWITCH			
INITIAL	419	.002102500	.88
ADDITIONAL	899	.002102500	1.89
INTERSWITCH			
INITIAL	1,457	.002102500	3.06
ADDITIONAL	8,593	.002102500	18.07
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	132	.002102500	.28
ADDITIONAL	233	.002102500	.49
TEO			
SINGLE NETWORK			
INTERSWITCH			
INITIAL	1,458	.002102500	3.07
ADDITIONAL	8,593	.002102500	18.07
ACCESS			
ORIGINATING			
EO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	718	.002102500	1.51
ADDITIONAL	1,489	.002102500	3.13
TERMINATING			
TEO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	493	.002102500	1.04
ADDITIONAL	985	.002102500	2.07
CONTINUEE			

continued on next page

Detail of Usage
(Continued)

1. Total Usage by End Office – Each section concludes with the total usage charges for the end office.

BILL NO 615 QNN-NNNN NNN			
INVOICE NO 615QNNNNNNN-NNNNNN			
BILL DATE APR 22,2000			
OCN NNNN PAGE 50			
***** LOCAL USAGE FOR OFFICE CHTGTNRD0 ***** MAR 22 00 THRU APR 21 00			
RATE CATEGORY	QUANTITY	RATE	AMOUNT
TOTAL ULS - SWITCH FUNC	25,469		53.56
UNBUNDLED LOCAL SWITCHING - TRUNK PORT			
LOCAL			
ORIGINATING			
EC			
SINGLE NETWORK			
INTERSWITCH	10,050	.000228700	2.30
MULTIPLE NETWORK			
INTERSWITCH	364	.000228700	.08
TEO			
SINGLE NETWORK			
INTERSWITCH	10,051	.000228700	2.30
ACCESS			
ORIGINATING			
EC			
MULTIPLE NETWORK			
INTERSWITCH	658	.000228700	.15
TERMINATING			
TEO			
MULTIPLE NETWORK			
INTERSWITCH	575	.000228700	.13
TOTAL ULS - TRUNK PORT	21,698		4.96
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 5185			58.52
UNBUNDLED MISCELLANEOUS - TN - EC 5185			
800 ACCESS 10 DIGIT SCREENING			
800 DELIVERY	394	004000000	1.58
DIRECTORY ASSISTANCE CALL			
COMPLETION	1	120000000	.12
TOTAL UNBUNDLED MISCELLANEOUS CHARGES - TN - EC 5185			1.70
TOTAL LOCAL USAGE CHARGES FOR OFFICE CHTGTNRD0			83.41

TOTAL USAGE CHARGES FOR OFFICE CHTGTNRD0			83.41

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**Detail of Usage
(Continued)**

This is a summary of the unbundled usage charges by state.

BILL NO	615 QNN-NNNN NNN
INVOICE NO	615QNNNNNN-NNNNN
BILL DATE	APR 22,2000
OCN NNNN	PAGE 144

***** SUMMARY OF UNBUNDLED USAGE CHARGES *****
 TENNESSEE - 5185

	LOCAL	
TOTAL UNBUNDLED TRANSPORT CHARGES		314.05
TOTAL END OFFICE CHARGES		864.71
TOTAL MISCELLANEOUS CHARGES		61.01

TOTAL USAGE CHARGES		1,239.77

This is a summary of the unbundled usage charges for all states.

BILL NO	615 QNN-NNNN NNN
INVOICE NO	615QNNNNNN-NNNNN
BILL DATE	APR 22,2000
OCN NNNN	PAGE 145

***** SUMMARY OF UNBUNDLED USAGE CHARGES *****
 TOTAL - ALL STATES/ECS

	TOTAL	
TOTAL UNBUNDLED TRANSPORT CHARGES		314.05
TOTAL END OFFICE CHARGES		864.71
TOTAL MISCELLANEOUS CHARGES		61.01

TOTAL USAGE CHARGES		1,239.77

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Bill Index

This section is an index of the bill by page number, section and end office.

				BILL NO 615 QNN-NNNN NNN	
				INVOICE NO 615QNNNNNNN-MNNNN	
				BILL DATE APR 22, 2000	
				OCN NNNN LAST PAGE 147	
PAGE	REFERENCE NO	PAGE	REFERENCE NO	PAGE	REFERENCE NO
1	BILL FACE PAGE				
4	OC-AND-C PAGE				
45	CHTGTNRBDS0				
51	CHTGTNDTDS0				
57	CHTGTNNS84T				
58	CHTGTNRBDS0				
65	CLEVTNMADS0				
70	GALLTNMADS0				
74	HNSNTNMTRS0				
77	KNVLTNFCDS0				
84	KNVLTNMADS1				
90	MMPHTNBADS0				
93	MMPHTNELDS0				
101	MMPHTNGTDS0				
110	MMPHTNMADS0				
112	MMPHTNMA84T				
114	MMPHTNMTCG0				
118	MMPHTNOADS1				
127	MMPHTNSTDS0				
136	OKRGTNMTDS0				
146	TAXES				

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N Bill

Overview

This is a type of bill format that is used for stand alone non-design loops.

Some of the unique features of the N Bill:

- Facilities Access Circuit Listing
- Bill Index

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Bill Index

This section is an index of the bill by page number and section.

BILL NO						904 QNN-NNNN NNN					
INVOICE NO						904ONNNNNN-00102					
BILL DATE						APR 11, 2000					
OCN NNNN LAST PAGE						738					
<hr/>											
PAGE	REFERENCE NO	PAGE	REFERENCE NO	PAGE	REFERENCE NO	PAGE	REFERENCE NO	PAGE	REFERENCE NO	PAGE	REFERENCE NO
1	BILL FACE PAGE										
4	LATE PAY CHGS										
5	OC-AND-C PAGE										
482	TAXES										
483	CKT PAGE										

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**Customer Service
Record Layout –
J Bill**

A Customer Service Record (CSR) is part of a J account that contains the customer account information and services and features that a UNE CLEC has ordered. CSR information is derived from the Service Order that the customer has submitted. The following section shows some of the major components of the CSR associated with the J Bill.

**CSR – J Bill
Description**

The following page is a summary of the CSR associated with the J Bill.

The following are some features unique to this section:

1. CLS SVC – The first three letters of this class of service code distinguish this CSR as associated with a J Bill. The first three letters will be: UEP.
2. AECN – This is the alternate exchange carrier name and it is followed by four digits of the OCN code.
3. OCL Unknown – This refers to the first part of the CSR Services and Features section that captures all of the charges that do not directly apply to an individual telephone number. Subsequent parts of this section are uniquely identified with a telephone number.
4. Telephone Number – As stated earlier, each part of the Service and Features section can be uniquely identified by a telephone number. These telephone numbers roll up to an end office and the end office is then listed on the Usage section of the J Bill.
5. Last Completed Activity – This section gives a complete listing of all activity posted to this account since the last bill period.
6. Tax Legend - This shows the types of taxes and the corresponding code.
7. Location Inventory – This section lists the OCL in alphabetical order and then subsequently assigns a corresponding ASG in numerical order. In other words, the ASG will change for a given office, if the order in which the offices are listed, changes in any way.
8. English Language Glossary – This following glossary lists the USOC codes and brief description of the service.

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CSR - J Bill
Screen Print

1			ASG 000001 ASG 000002							
			CUSTOMER SERVICE RECORD							
			(CSR)	615 QNN-NNNN NNN						
			04-25-00	PAGE	1					
			<CUSTOMER NAME>							
			CLS SVC	BILL DAY	ACCT DATE	FOR TELCO USE				
2		BILLING INQUIRIES CALL	UEPBX	22	04-22-00	ICSC OFC BS01				
		(800) 773-4967								
		---ACCOUNT IDENTIFICATION---								
		FOR TELCO USE: AECN NNNN	TAR	09170	TAX	BCDEJ	MAN	U3290		
		BILLED TO:	<CUSTOMER NAME 1>							
			<CUSTOMER NAME 2>							
			<ADDRESS 1>							
			<ADDRESS 2>							
			<CITY>	<STATE>	<ZIP CODE>					
		CUSTOMER SERVICE ADDRESS:	<CUSTOMER NAME>							
			1-<ADDRESS>							
			1-ZZZZZZZZZZZ							
		SPECIAL HANDLING:								
		BILLING DATA TAPE:								
		CONTAINS BILL AND CSR								
		CODE-A								
		PRINT REQUESTS:								
		CONTAINS BILL								
		COPIES-01								
		CONTAINS CSR								
		COPIES-01								
3		---SERVICE AND FEATURES---								
		SVC								
		ESTBL	:QTY	:CODE	: DESCRIPTION	:TAX:	AMOUNT	:ACTVTY	:DATE	
		010600		ASG 000001/OCL	UNKNOWN			042200		
		010600	1	UEPBX /SED	01-06-00			042200		
		010600		TN	615 QNN-NNNN			030100		
		010600	1	UNECN /LSO	615 Q92/TAR 091,701/ZRCI	8	0.00	030100		
				<CUSTOMER NAME>						
				<TEL NUMBER>						
				/AECN NNNN/SED 01-06-00/ZSER						
				XXXXXXXXXX/LA <ADDRESS>						
				<CITY>						
				LOCAL SUBTOTAL						0.00
				ASG SUBTOTAL						0.00
		031600		ASG 000002/OCL	CHTGTRBDRS0			042200		
		031600	1	UEPBX /SED	01-06-00			042200		
		031600		HTG A 423	NNN-NNNN, 423 NNN-NNNN,			042200		
4										

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CSR – J Bill
Screen Print
(Continued)

SVC		ESTBL		QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY	DATE
ASG 000001 ASG 000002										
CUSTOMER SERVICE RECORD										
(CSR) 615 QNN-NNNN NNN										
04-25-00 PAGE 2										
<CUSTOMER NAME>										
---SERVICE AND FEATURES---										
423 NNN-NNNN, 423 NNN-NNNN										
031600		TN				423 NNN-NNNN				041700
031600	1	UEPBL	/TN			423 NNN-NNNN/LSC 423 893	1,2	6.85		041700
			/TAR			127,704/PIC 0432/LPIC	3,4			
						0432/PCA OF, 03-14-00/LPCA OF,	8			
						03-14-00/HTG A/ZNB/AECN NNNN				
						/SED 03-16-00/ZDCA/ZSER				
						XXXXXXXXXX/LA <ADDRESS> ,				
						<CITY>/SA <ADDRESS> ,				
						<CITY>				
031600	1	MBBF	/TN			423 NNN-NNNN/LSC 423 893	8	0.00		031600
			/TAR			127,704/MTN 423 NNN-				
						NNNN/DLNM 1-XXXXXXXXXXXX/AECN				
						NNNN/SED 03-16-00/ZSER				
						XXXXXXXXXX/LA <ADDRESS> ,				
						<CITY>/SA <ADDRESS> ,				
						<CITY>				
031600	1	CREX4	/TN			423 NNN-NNNN/LSC 423 893	8	0.00		031600
			/TAR			127,704/CBK B/AECN NNNN				
						/SED 03-16-00/ZSER XXXXXXXXXXXX				
						/LA <ADDRESS> , <CITY>				
						/SA <ADDRESS> ,				
						<CITY>				
						LOCAL SUBTOTAL		386.40		
						ASG SUBTOTAL		386.40		
						ACCOUNT TOTAL		6,699.56		
						---SUMMARY---				
						LAST COMPLETED ACTIVITY				
						REV ADJ		000424		
						REV ADJ		000420		
						REV ADJ		000419		
						REV ADJ		000418		
						REV ADJ		000416		
						REV ADJ		000415		

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CSR – J Bill
(Continued)

CUSTOMER SERVICE RECORD (CSR) 615 QNN-NNNN NNN		
04-25-00	PAGE 161	
<CUSTOMER NAME>		
---SUMMARY---		
LAST COMPLETED ACTIVITY		
XXXXXXXXXX	000417	
XX NNN	000417	
XXXXXXXXXXXXXX	000401	
XXXXXXXXXXXXXX	000417	
XXXXXXXXXXXXXX	000417	
XX NNN	000417	
NNNNNNNNNNNNXX	000401	
XXXXXXXXXXXXXX	000417	
XXXXXXXXXXXXXX	000417	
XXXXXXXXXXXXXX	000417	
XXXXXXXXXXXXXX	000417	
XXXXXXXXXXXXXX	000417	
XXXXXXXXXXXXXX	000417	
XX NNN	000417	
XXXXXXXXXX	000407	
TAX LEGEND		
TYPE	APPLICABLE CODE	EXEMPT CODE
FEDERAL	1	B
STATE	2	C
CITY	3	D
COUNTY	4	E
STATE SALES	5	J
LOCAL SALES	6	H
FRANCHISE	8	F
GROSS RECEIPT	9	K

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CSR - J Bill
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CUSTOMER SERVICE RECORD
(CSR) 615 QNN-NNNN NNN
04-25-00 PAGE 162
<CUSTOMER NAME>

---SUMMARY---

LOCATION INVENTORY

OCL	ASG	PAGE
UNKNOWN	000001	1
CHTGTNBRDS0	000002	1
CHTGTNDTDS0	000003	12
CHTGTNRBDS0	000004	14
CLEVTNMADS0	000005	25
GALLTNMADS0	000006	42
HNSNTNMTRS0	000007	51
KNVLTNFCDS0	000008	54
KNVLTNMADS1	000009	56
MMPHTNBADS0	000010	59
MMPHTNELDS0	000011	63
MMPHTNGTDS0	000012	85
MMPHTNMADS0	000013	97
MMPHTNMTCG0	000014	99
MMPHTNOADS1	000015	102
MMPHTNSTDS0	000016	115
OKRGTNMTDS0	000017	142

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ENGLISH LANGUAGE GLOSSARY

ADSR	ADMIN OF DESIGN SVCS REVIEW
AECN	ALTERNATE EXCHANGE CARRIER NAME
ASG	ACCESS SERVICE GROUP
BLKD	BLOCK DIRECTORY ASSISTANCE REQUEST
CAT	CENTREX ACCESS TREATMENT
CBK	CALL BLOCKING S&E
CPG	CALL PICKUP GROUP
DI	DEPARTMENTAL IDENTIFICATION
DLNM	DIAL NAME
DPG	DIALING PLAN GROUP
HTC	HUNTING-CIRCULAR
HTG	HUNTING
HTY	HUNTING TYPE
LA	LISTED ADDRESS
LCC	LINE CLASS CODE
LPCA	PRESUB INTRALATA CARRIER ARNGMT
LPIC	PREDESIGNATED INTRALATA CARRIER
LPS	LOOP START
LSO	LOCAL SERVING OFFICE
MAN	MAJOR ACCOUNT NUMBER
MBTN	MAILBOX TELEPHONE NUMBER
MVP	MULTILINE VARIETY PACKAGE
NCF	NUMBER OF CALLS FORWARDED

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**Customer Service
Record Layout –
N Bill**

A Customer Service Record (CSR) is part of an N account that contains the customer account information and services and features that a UNE CLEC has ordered. CSR information is derived from the Service Order that the customer has submitted. The following section shows some of the major components of the CSR associated with the N Bill.

**CSR – N Bill
Description**

The following page is an example of the CSR associated with the N Bill. The following are some features unique to this CSR:

1. CLS SVC – This class of service code distinguishes this CSR as associated with a N Bill. The letters will be: UEANL.
2. AECN – This is the alternate exchange carrier name and it is followed by four digits of the OCN code.
3. Circuit ID – This refers to the physical location of the customer's equipment.

Note: Any charges not associated with a circuit ID are floated to the top of the CSR.

4. Last Complete Activity – This section gives a complete listing of all activity posted to this account since the last bill period.
5. Tax Legend - This shows the types of taxes and the corresponding code.
6. Facility Access Inventory – Show the page number by circuit ID.
7. English Language Glossary – This shows the USOC codes and a brief description of the service.

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CSR - N Bill
Screen Print

1		CUSTOMER SERVICE RECORD (CSR) 904 QNN-NNNN NNN 04-14-00 PAGE 1 <CUSTOMER NAME 1> <CUSTOMER NAME 2>
2		BILLING INQUIRIES CALL CLS SVC BILL DAY ACCT DATE FOR TELCO USE (800) 773-4967 UEANL 11 04-11-00 ICSC OFC BS01 ---ACCOUNT IDENTIFICATION--- FOR TELCO USE: AECN NNNN TAR 11170 TAX BODEJ MAN BILLED TO: <CUSTOMER NAME 1> <CUSTOMER NAME 2> <ADDRESS 1> <ADDRESS 2> <CITY> <STATE> <ZIP CODE> CUSTOMER SERVICE ADDRESS: <CUSTOMER NAME 1> <CUSTOMER NAME 2> 1-<ADDRESS> 1-ZZZZZZZZZZZ SPECIAL HANDLING: BILLING DATA TAPE: CONTAINS BILL AND CSR <CUSTOMER NAME 1>, CODE-A <ADDRESS 1> <ADDRESS 2> <CITY>, <STATE> <ZIP CODE> PRINT REQUESTS: CONTAINS BILL COPIES-01 CONTAINS CSR COPIES-01 ---SERVICE AND FEATURES--- SVC ESTBL :QTY :CODE : DESCRIPTION :TAX: AMOUNT :ACTVTY :DATE 112399 CLS 30.TYNU.NNNNNN..SB 051700 112399 1 UEANL /SED 07-29-99 051700 112399 CKL 1-<ADDRESS>, <CITY>, <STATE>/LOC 051700 <ADDRESS>/SN <CUSTOMER NAME> 112399 1 UEAL2 /CLS 30.TYNU.NNNNNN..SB/LSO 1,8 16.51 043000 706 849/TAR 218,921/CA VBIL1 /PR 102/AECN NNNN/SED 11-23- 99/ZSER NNNNNNNNNN/LA <ADDRESS>, <CITY>/SA <ADDRESS>, <CITY> 031400 CKL 2-<ADDRESS>, <CITY & STATE> 041100 /SN <CUSTOMER NAME> 031400 1 UEAL2 /CLS 30.TYNU.NNNNNN..SB/LSO 1,2 17.00 031400 407 240/TAR 000,901/LPS/AECN 8,9 NNNN/SED 03-14-00/ZDCA/ZSER NNNNNNNNNN/LA <ADDRESS> AV/SA 2095 PREMIER ROW, ORL LOCAL SUBTOTAL 17.00 CIRCUIT SUBTOTAL 17.00 ACCOUNT TOTAL 104,764.05
3		

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CSR – N Bill
Screen Print
(Continued)

4

CUSTOMER SERVICE RECORD
(CSR) 904 QNN-NNNN NNN
04-14-00 PAGE 5487
<CUSTOMER NAME 1>
<CUSTOMER NAME 2>

---SUMMARY---

LAST COMPLETED ACTIVITY

5

NXXXXXXX 000331
NNNNNNNNNNRC 000401

TAX LEGEND

TYPE	APPLICABLE CODE	EXEMPT CODE
FEDERAL	1	B
STATE	2	C
CITY	3	D
COUNTY	4	E
STATE SALES	5	J
LOCAL SALES	6	H
FRANCHISE	8	F
GROSS RECEIPT	9	K

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FACILITY ACCESS INVENTORY

ASG	CLF/CFA/CIRCUIT	PAGE
	30.TYNU.NNNNNN..SB	17
	30.TYNU.NNNNNN..SB	18
	30.TYNU.NNNNNN..SB	19
	30.TYNU.NNNNNN..SB	20
	30.TYNU.NNNNNN..SB	21
	30.TYNU.NNNNNN..SB	22
	30.TYNU.NNNNNN..SB	23
	30.TYNU.NNNNNN..SB	24
	30.TYNU.NNNNNN..SB	25
	30.TYNU.NNNNNN..SB	26
	30.TYNU.NNNNNN..SB	27
	30.TYNU.NNNNNN..SB	27
	30.TYNU.NNNNNN..SB	28

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---SUMMARY---

ENGLISH LANGUAGE GLOSSARY

CLS	COM LNG CIRCUIT ID-SERIAL NUM FRMAT
DI	DEPARTMENTAL IDENTIFICATION
FSO	FOREIGN SWITCHING OFFICE
LA	LISTED ADDRESS
LOC	LOCATION
LPS	LOOP START
LSO	LOCAL SERVING OFFICE

Docket No.: 031125-TP
Witnesses: Raquel Rencher and Elizabeth Fefer
Exhibit No. _____(RR/EF-13)
Excerpt from BellSouth Billing Guide
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22.2 Unless otherwise provided in this Agreement, notice by mail shall be effective on the date it is officially recorded as delivered by return receipt or equivalent, and in the absence of such record of delivery, it shall be presumed to have been delivered the fifth day, or next business day after the fifth day, after it was deposited in the mails.

22.3 Notwithstanding the foregoing, either party may provide notice to the other via Internet posting of price changes, changes to the terms and conditions of services available for resale, changes to business processes and policies, notices of new service offerings, and changes to service offerings not requiring an amendment to this Agreement. Further, BellSouth may provide via Internet posting, notices required to be posted to BellSouth's website, and any other information of general applicability to CLECs.

23. Rule of Construction

No rule of construction requiring interpretation against the drafting Party hereof shall apply in the interpretation of this Agreement.

24. Headings of No Force or Effect

The headings of Articles and Sections of this Agreement are for convenience of reference only, and shall in no way define, modify or restrict the meaning or interpretation of the terms or provisions of this Agreement.

25. Multiple Counterparts

This Agreement may be executed multiple counterparts, each of which shall be deemed an original, but all of which shall together constitute but one and the same document.

26. Implementation of Agreement

If IDS is a facilities based provider or a facilities based and resale provider, this section shall apply. Within 60 days of the execution of this Agreement, the Parties may adopt a schedule for the implementation of the Agreement. The schedule shall state with specificity time frames for submission of including but not limited to, network design, interconnection points, collocation arrangement requests, pre-sales testing and full operational time frames for the business and residential

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fails to perform such obligations. Notwithstanding anything to the contrary in this Section, IDS Telecom shall not assign this Agreement to any Affiliate or non-affiliated entity unless either (1) IDS Telecom pays all bills, past due and current, under this Agreement, or (2) IDS Telecom's assignee expressly assumes liability for payment of such bills.

20. Notices

20.1 Every notice, consent, approval, or other communications required or contemplated by this Agreement shall be in writing and shall be delivered by hand, by overnight courier or by US mail postage prepaid, address to:

BellSouth Telecommunications, Inc.

BellSouth Local Contract Manager
600 North 19th Street, 8th floor
Birmingham, Alabama 35203

and

ICS Attorney
Suite 4300
675 W. Peachtree St.
Atlanta, GA 30375

IDS Telecom LLC

Angel Leiro
V-P Regulatory Affairs
1525 N. W. 167th Street
2nd Floor
Miami, Florida
aleiro@IDSTELCOM.com

or at such other address as the intended recipient previously shall have designated by written notice to the other Party.

20.2 Unless otherwise provided in this Agreement, notice by mail shall be effective on the date it is officially recorded as delivered by return receipt or equivalent, and in the absence of such record of delivery, it shall be presumed to have been delivered the fifth day, or next business day after the fifth day, after it was deposited in the mails.

20.3 Notwithstanding the foregoing, BellSouth may provide IDS Telecom notice via Internet posting of price changes and changes to the terms and conditions of services available for resale per Commission Orders. BellSouth will also post

changes to business processes and policies, notices of new service offerings, and changes to service offerings not requiring an amendment to this Agreement, notices required to be posted to BellSouth's website, and any other information of general applicability to CLECs.

21. Rule of Construction

No rule of construction requiring interpretation against the drafting Party hereof shall apply in the interpretation of this Agreement.

22. Headings of No Force or Effect

The headings of Articles and Sections of this Agreement are for convenience of reference only, and shall in no way define, modify or restrict the meaning or interpretation of the terms or provisions of this Agreement.

23. Multiple Counterparts

This Agreement may be executed in multiple counterparts, each of which shall be deemed an original, but all of which shall together constitute but one and the same document.

24. Filing of Agreement

Upon execution of this Agreement it shall be filed with the appropriate state regulatory agency pursuant to the requirements of Section 252 of the Act, and the Parties shall share equally any filing fees therefor. If the regulatory agency imposes any filing or public interest notice fees regarding the filing or approval of the Agreement, IDS Telcom shall be responsible for publishing the required notice and the publication and/or notice costs shall be borne by IDS Telcom.

Notwithstanding the foregoing, this Agreement shall not be submitted for approval by the appropriate state regulatory agency unless and until such time as IDS Telcom is duly certified as a local exchange carrier in such state, except as otherwise required by a Commission.

25. Compliance with Applicable Law

Each Party shall comply at its own expense with Applicable Law.

26. Necessary Approvals

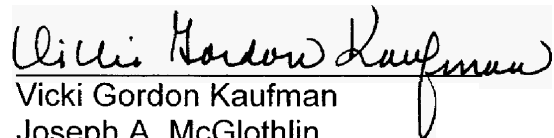
Each Party shall be responsible for obtaining and keeping in effect all approvals from, and rights granted by, governmental authorities, building and property owners, other carriers, and any other persons that may be required in connection with the performance of its obligations under this Agreement. Each Party shall reasonably cooperate with the other Party in obtaining and maintaining any required approvals and rights for which such Party is responsible.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Rebuttal Testimony and Exhibits of Raquel Rencher & Elizabeth Fefer on behalf of IDS Telcom, LLC. has been provided by (*) hand delivery and U.S. Mail, this 12th day of August, 2004, to the following:

(*) Patricia Christensen
Office of General Counsel
Room 370 Gunter Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

(*) James Meza, III
Nancy B. White
c/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556



Vicki Gordon Kaufman
Joseph A. McGlothlin
McWhirter Reeves McGlothlin
Davidson Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, FL 32301
Tel: (850) 222-2525
Fax: (850) 222-5606

Attorneys for IDS Telcom, LLC