

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 040130-TP  
Request for Confidential Classification  
Page 1 of 1  
04/04/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION TO STAFF'S 3RD  
INTERROGATORY, ITEM NOS. 82, 83, 84, 88, AND 89 AND THIRD REQUESTS  
FOR PRODUCTION OF DOCUMENTS, ITEM NO 20,  
FILED MARCH 15, 2004 AND MARCH 21, 2005  
IN FLORIDA DOCKET NO. 040130-TP**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

DOCUMENT NUMBER-DATE

03292 APR-4 05

FPSC-COMMISSION CLERK

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 040130-TP  
Staff's 3<sup>rd</sup> Request for Production  
February 22, 2005  
Item No. 20  
Attachment C

**REDACTED COPY**

**ENTIRE DOCUMENT IS PROPRIETARY**

REQUEST: For purposes of the following questions, please refer to BellSouth's 2004 Florida-specific monthly billing data sent to each of the Joint Petitioners for UNEs, interconnection, and resell:

- a. How many bills were sent monthly to each of the Joint Petitioners?
- b. How many of the bills identified in your response to (a) were paid by the original due date?
- c. How many bills identified in your response to (a) were disputed by each Joint Petitioner?

SUPPLEMENTAL RESPONSE:

The data provided in response to this Interrogatory is proprietary and is being provided pursuant to the parties protective agreement.

- a. In 2004, the Joint Petitioners received the following bills on a monthly basis:

Customer Name	Month	CRIS/Oracle Bills	CABS Bills	TOTAL
KMC TELECOM INC	January	10	91	101
	February	10	90	100
	March	10	90	100
	April	10	89	99
	May	11	85	96
	June	11	73	84
	July	11	72	83
	August	11	72	83
	September	11	71	82
	October	11	71	82
	November	11	68	79
	December	11	58	69
KMC TELECOM INC 2004 Total		128	930	1058

SUPPLEMENTAL RESPONSE (CONT.):

NEWSOUTH	January	4	114	118
	February	4	112	116
	March	4	112	116
	April	4	111	115
	May	4	111	115
	June	4	110	114
	July	4	108	112
	August	4	111	115
	September	4	112	116
	October	4	111	115
	November	4	106	110
	December	4	100	104
NEWSOUTH 2004 Total		48	1318	1366

NUVOX COMMUNICATIONS	January	14	79	93
	February	14	78	92
	March	13	81	94
	April	13	83	96
	May	13	83	96
	June	13	82	95
	July	13	82	95
	August	13	66	79
	September	14	56	70
	October	14	49	63
	November	13	50	63
	December	11	51	62
NUVOX COMMUNICATIONS 2004 Total		158	840	998

BellSouth Telecommunications, Inc.  
 Florida Public Service Commission  
 Docket No. 040130-TP  
 Staff's 3<sup>rd</sup> Interrogatories  
 February 22, 2005  
 SUPPLEMENTAL RESPONSE Item No. 82  
 Page 3 of 5  
 PUBLIC VERSION

SUPPLEMENTAL RESPONSE (CONT.):

XPEDIUS	January	15	94	109
	February	15	95	110
	March	15	95	110
	April	15	94	109
	May	15	96	111
	June	15	98	113
	July	15	97	112
	August	15	97	112
	September	15	95	110
	October	15	60	75
	November	15	50	65
	December	15	47	62
XPEDIUS 2004 Total		180	1018	1198

b. The bills identified above were paid as shown below:

Customer Name	Month	Paid late or partial	Paid on time	Information not available	% Paid On time (Excluding NA)
KMC TELECOM INC.	January				
	February				
	March				
	April				
	May				
	June				
	July				
	August				
	September				
	October				
	November				
	December				
KMC TELECOM INC. Total					

SUPPLEMENTAL RESPONSE (CONT.):

NEWSOUTH COMMUNICATIONS	January	
	February	
	March	
	April	
	May	
	June	
	July	
	August	
	September	
	October	
	November	
	December	
NEWSOUTH COMMUNICATIONS Total		

NuVox	January	
	February	
	March	
	April	
	May	
	June	
	July	
	August	
	September	
	October	
	November	
	December	
NuVox Total		

SUPPLEMENTAL RESPONSE (CONT.):

	January	
	February	
	March	
	April	
	May	
	June	
	July	
	August	
	September	
	October	
	November	
	December	
Xspedius Total		

c. The petitioners submitted disputes on 2004 billing on these bans as shown below:

Company	Number of BANS/Bills Disputed
KMC	59
NEWSOUTH	84
XSPEDIUS	238
Total BANS/Bills Disputed by Petitioners	429

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 040130-TP  
Staff's 3<sup>rd</sup> Interrogatories  
February 22, 2005  
Item No. 83

**ATTACHMENT TO INTERROGATORY,  
ITEM NO. 83**

**REDACTED COPY**

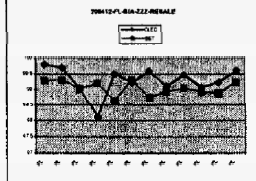


Florida, January 2004 - December 2004  
Billing

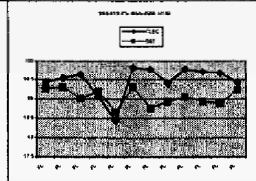
Invoice Accuracy (Measured in Dollars)  
(% Bill Accuracy)

Numerator indicates total billed revenue minus adjustments for this disaggregation  
Volume indicates total billed revenue for this disaggregation

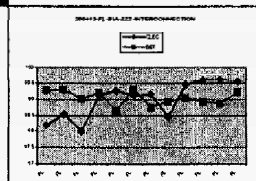
Month	State	Product Group	Description	Base Market	Actual	% Accuracy	Volume	Volume	% Accuracy	Delta	Volume	Delta
Jan-04	FL	Resale	RETAIL	493038585	496815955	99.28 %	3167839	3174449	99.79 %	-107,552	YES	
Feb-04	FL	Resale	RETAIL	494201588	497660791	99.30 %	3011472	3020752	99.69 %	-80,897	YES	
Mar-04	FL	Resale	RETAIL	<b>491064621</b>	<b>495942167</b>	<b>99.02 %</b>	<b>2783611</b>	<b>2810847</b>	<b>99.03 %</b>	<b>-2,462</b>	<b>YES</b>	
Apr-04	FL	Resale	RETAIL	501393317	505442253	99.20 %	2698096	2717418	98.11 %	200,5729	NO	
May-04	FL	Resale	RETAIL	501052332	507869149	98.66 %	2567199	2580009	99.50 %	-117,7506	YES	
Jun-04	FL	Resale	RETAIL	473672536	476972523	99.31 %	2535300	2555596	99.21 %	19,6789	NO	
Jul-04	FL	Resale	RETAIL	476276056	482285218	98.75 %	2398897	2406705	99.59 %	-118,9708	YES	
Aug-04	FL	Resale	RETAIL	488783666	494076125	98.93 %	2201201	2221535	99.08 %	-22,5138	YES	
Sep-04	FL	Resale	RETAIL	<b>561613319</b>	<b>566969965</b>	<b>99.06 %</b>	<b>2254752</b>	<b>2266764</b>	<b>99.47 %</b>	<b>-64,4418</b>	<b>YES</b>	
Oct-04	FL	Resale	RETAIL	<b>468796088</b>	<b>473866321</b>	<b>98.93 %</b>	<b>2148498</b>	<b>2169948</b>	<b>99.06 %</b>	<b>-18,7912</b>	<b>YES</b>	
Nov-04	FL	Resale	RETAIL	475306958	480681008	98.88 %	1825077	1839461	99.22 %	-43,2834	YES	
Dec-04	FL	Resale	RETAIL	472857473	476499683	99.24 %	1785311	1802528	99.60 %	-56,0254	YES	
Jan-04	FL	UNE	RETAIL	493038585	496815955	99.28 %	20359136	20476134	99.43 %	-78,1136	YES	
Feb-04	FL	UNE	RETAIL	494201588	497660791	99.30 %	21801797	21701999	99.54 %	-128,097	YES	
Mar-04	FL	UNE	RETAIL	491064621	495942167	99.02 %	21939271	22018655	99.64 %	-269,8582	YES	
Apr-04	FL	UNE	RETAIL	501393317	505442253	99.20 %	22157917	22368760	99.06 %	73,4722	NO	
May-04	FL	UNE	RETAIL	501052332	507869149	98.66 %	<b>22337108</b>	<b>22603169</b>	<b>98.43 %</b>	<b>91,8616</b>	<b>NO</b>	
Jun-04	FL	UNE	RETAIL	473672536	476972523	99.31 %	25866458	25911230	99.82 %	-308,1342	YES	
Jul-04	FL	UNE	RETAIL	476276056	482285218	98.75 %	22879059	22929835	99.78 %	-432,124	YES	
Aug-04	FL	UNE	RETAIL	488783666	494076125	98.93 %	22770633	22907311	99.40 %	-215,6815	YES	
Sep-04	FL	UNE	RETAIL	<b>561613319</b>	<b>566969965</b>	<b>99.06 %</b>	<b>2256881</b>	<b>22606088</b>	<b>99.78 %</b>	<b>-350,444</b>	<b>YES</b>	
Oct-04	FL	UNE	RETAIL	<b>468796088</b>	<b>473866321</b>	<b>98.93 %</b>	<b>22116531</b>	<b>22179596</b>	<b>99.72 %</b>	<b>-352,6785</b>	<b>YES</b>	
Nov-04	FL	UNE	RETAIL	475306958	480681008	98.88 %	21808368	21877610	99.68 %	-348,7094	YES	
Dec-04	FL	UNE	RETAIL	472857473	476499683	99.24 %	<b>23876953</b>	<b>24016455</b>	<b>99.42 %</b>	<b>-100,7466</b>	<b>YES</b>	
Jan-04	FL	Interconnection	RETAIL	493038585	496815955	99.28 %	5000965	5093858	98.18 %	291,9167	NO	
Feb-04	FL	Interconnection	RETAIL	494201588	497660791	99.30 %	5368515	5438169	98.54 %	214,8503	NO	
Mar-04	FL	Interconnection	RETAIL	491064621	495942167	99.02 %	5116792	5221702	97.99 %	236,2563	NO	
Apr-04	FL	Interconnection	RETAIL	501393317	505442253	99.20 %	5349151	5396128	99.13 %	18,0117	NO	
May-04	FL	Interconnection	RETAIL	501052332	507869149	98.66 %	5644394	5689292	99.20 %	-124,7575	YES	
Jun-04	FL	Interconnection	RETAIL	473672536	476972523	99.31 %	5725416	5776108	99.12 %	53,5362	YES	
Jul-04	FL	Interconnection	RETAIL	476276056	482285218	98.75 %	5530878	5577767	99.16 %	-85,8057	YES	
Aug-04	FL	Interconnection	RETAIL	488783666	494076125	98.93 %	5037208	5116790	98.44 %	106,838	NO	
Sep-04	FL	Interconnection	RETAIL	<b>561613319</b>	<b>566969965</b>	<b>99.06 %</b>	<b>4875360</b>	<b>4901965</b>	<b>99.46 %</b>	<b>-91,6139</b>	<b>YES</b>	
Oct-04	FL	Interconnection	RETAIL	<b>468796088</b>	<b>473866321</b>	<b>98.93 %</b>	<b>5011813</b>	<b>5031002</b>	<b>99.82 %</b>	<b>-149,9381</b>	<b>YES</b>	
Nov-04	FL	Interconnection	RETAIL	475306958	480681008	98.88 %	5077899	5099846	99.82 %	-158,5159	YES	
Dec-04	FL	Interconnection	RETAIL	472857473	476499683	99.24 %	5132452	5154634	99.57 %	-85,608	YES	



Bill Performance



Bill Performance



Bill Performance

Contains private and/or proprietary information.  
May only be used for authorized BellSouth business purposes  
and only by authorized individuals.

Florida, January 2004 - December 2004

Billing

Invoice Accuracy (Measured in Dollars)

(% Bill Accuracy)

Measure Month	State	Product Group Description	BSI Metric	KMC	NEWSOUTH	NOVOX	XSPEDIUS	COMMENTS
Jan-04	FL	Resale	99.28 %					
Feb-04	FL	Resale	99.30 %					
Mar-04	FL	Resale	99.02 %					
Apr-04	FL	Resale	99.20 %					
May-04	FL	Resale	98.66 %					
Jun-04	FL	Resale	99.31 %					
Jul-04	FL	Resale	98.75 %					
Aug-04	FL	Resale	98.93 %					
Sep-04	FL	Resale	99.06 %					
Oct-04	FL	Resale	98.93 %					
Nov-04	FL	Resale	98.88 %					
Dec-04	FL	Resale	99.24 %					
Jan-04	FL	UNE	99.28 %					
Feb-04	FL	UNE	99.30 %					
Mar-04	FL	UNE	99.02 %					
Apr-04	FL	UNE	99.20 %					
May-04	FL	UNE	98.66 %					
Jun-04	FL	UNE	99.31 %					
Jul-04	FL	UNE	98.75 %					
Aug-04	FL	UNE	98.93 %					
Sep-04	FL	UNE	99.06 %					
Oct-04	FL	UNE	98.93 %					
Nov-04	FL	UNE	98.88 %					
Dec-04	FL	UNE	99.24 %					
Jan-04	FL	Interconnection	99.28 %					
Feb-04	FL	Interconnection	99.30 %					
Mar-04	FL	Interconnection	99.02 %					
Apr-04	FL	Interconnection	99.20 %					
May-04	FL	Interconnection	98.66 %					
Jun-04	FL	Interconnection	99.31 %					
Jul-04	FL	Interconnection	98.75 %					
Aug-04	FL	Interconnection	98.93 %					
Sep-04	FL	Interconnection	99.06 %					
Oct-04	FL	Interconnection	98.93 %					
Nov-04	FL	Interconnection	98.88 %					
Dec-04	FL	Interconnection	99.24 %					

Contains private and/or proprietary information.  
 May only be used for authorized BellSouth business purposes  
 and only by authorized individuals.

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 040130-TP  
Staff's 3<sup>rd</sup> Interrogatories  
February 22, 2005  
Item No. 84

**ATTACHMENT TO INTERROGATORY,  
ITEM NO. 84**

**REDACTED COPY**

Billing Invoice Accuracy - Repeats

COMPANY DESCRIPTION	200401	200402	200403	200404	200405	200406	200407	200408	200409	200410	200411	200412	Grand Total
KMC TELECOM II													
XSPEDIUS LLC													
<b>TOTAL</b>													

PROPRIETARY

Billing Invoice Accuracy -  
UNE

COMPANY DESCRIPTION	200401	200402	200403	200404	200405	200406	200407	200408	200409	200410	200411	200412	Grand Total
NEWSOUTH COMMUNICATIONS CORP													
XSPEDIUS LLC													
<b>TOTAL</b>													

PROPRIETARY

Billing Invoice Accuracy -  
Interconnection

COMPANY DESCRIPTION	200401	200402	200403	200404	200405	200406	200407	200408	200409	200410	200411	200412	Grand Total
KMTC TELECOM II													
NEWSOUTH COMMUNICATIONS CORP													
TOTAL													

PROPRIETARY

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 040130-TP  
Staff's 3<sup>rd</sup> Interrogatories  
February 22, 2005  
Item No. 88

**ATTACHMENT TO INTERROGATORY,  
ITEM NO. 88**

**REDACTED COPY**

Major Bankruptcies in 2003 and 2004 with a Presence in Florida

Customer	Case #	Date filed	Deposit Received	Debt after Deposit
		6/8/04		
		9/19/03		
		1/8/04		
		10/25/04		
		8/2/04		
		3/4/03		
		11/1/04		
			<b>\$949,000</b>	<b>\$23,011,760</b>

\* Estimated debt; final numbers are not available yet.



BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 040130-TP  
Staff's 3<sup>rd</sup> Interrogatories  
February 22, 2005  
Item No. 89

**ATTACHMENT TO INTERROGATORY,  
ITEM NO. 89**

**REDACTED COPY**

CUST NAME

ACCT NAME

area code

Bad debt

deposit

BD net of deposit

904, 305, 561

305

305

904

561 904 305

\$310,404.36

\$99,000

\$211,404