

ORIGINAL

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
RICHARD M. ELLIS
KENNETH A. HOFFMAN
LORENA A. HOLLEY
MICHAEL G. MAIDA
MARTIN P. McDONNELL
J. STEPHEN MENTON

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT
HAROLD F. X. PURNELL
MARSHA E. RULE
GARY R. RUTLEDGE
MAGGIE M. SCHULTZ
GOVERNMENTAL CONSULTANTS
PARSONS B. HEATH
MARGARET A. MENDUNI

March 21, 2006

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

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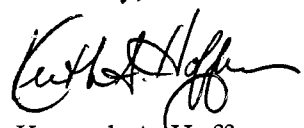
Re: Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket on behalf of Quincy Telephone Company, d/b/a TDS Telecom, Northeast Florida Telephone Company, d/b/a NEFCOM, GTC, Inc., d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC ("Small LECs") are the original and one copy of the Small LECs' Notice of Service of Late-Filed Deposition Exhibit Nos. 1 and 2 of Steven E. Watkins.


Please acknowledge receipt of these documents by stamping the extra copy of this letter filed and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,


Kenneth A. Hoffman

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of TDS Telecom d/b/a)
TDS Telecom/Quincy Telephone, ALLTEL)
Florida, Inc., Northeast Florida Telephone)
Company d/b/a NEFCOM, GTC, Inc. d/b/a)
GT Com, Smart City Telecommunications,)
LLC d/b/a Smart City Telecom, ITS Tele-)
communications Systems, Inc. and Frontier)
Communications of the South, LLC,)
("Joint Petitioner") objecting to and)
requesting suspension of Proposed Transit)
Traffic Service Tariff filed by BellSouth)
Telecommunications, Inc.)
_____)

Docket Nos. 050119-TP and 050125-TP

Filed: March 21, 2006

**SMALL LOCAL EXCHANGE COMPANIES'
NOTICE OF SERVICE OF LATE-FILED
DEPOSITION EXHIBITS OF STEVEN E. WATKINS**

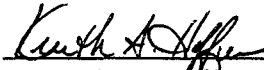
Quincy Telephone Company d/b/a TDS Telecom, Northeast Florida Telephone Company, d/b/a NEFCOM, GTC, Inc. d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC (hereinafter referred to collectively as the "Small LECs"), hereby file Notice that they have served Late-Filed Deposition Exhibit Nos. 1 and 2 of Steven E. Watkins by electronic mail to: Felicia Banks, Staff Counsel, Office of General Counsel, Florida Public Service Commission, 2450 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and the parties to this docket as set forth in the attached Certificate of Service, on this 21st day of March, 2006.

DOCUMENT NUMBER-DATE

02522 MAR 21 06

FPSC-COMMISSION CLERK

Respectfully submitted,



Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302
850-681-6788 (Telephone)
860-681-6515 (Telecopier)

-- and --

Benjamin H. Dickens, Jr., Esq.
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, Northwest
Washington, DC 20037
(202) 828-5510 (Telephone)
(202) 828-5568 (Telecopier)

Attorneys for Small LECs

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was furnished to the following this 21st day of March, 2006, by and Electronic Mail to the following:

Nancy B. White, Esq.
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301

Stephen B. Rowell, Esq.
ALLTEL
One Allied Drive, B5F11
Little Rock, AR 72202

Meredith E. Mays, Esq.
BellSouth Center - Suite 4300
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Mr. James White
ALLTEL Florida, Inc.
6867 Southpoint Drive, N.
Suite 103
Jacksonville, FL 32216-8005

Felicia Banks, Esq.
Michael Barrett, Esq.
Laura King, Esq.
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Tracy Hatch, Esq.
AT&T Communications of the Southern
States, LLC
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301-1549

J. Jeffry Wahlen, Esq.
Ausley Law Firm
127 Calhoun Street
Tallahassee, Florida 32301

Vicki Gordon Kaufman, Esq.
Moyle Flanigan Katz Raymond & Sheehan,
P.A.
118 North Gadsden Street
Tallahassee, FL 32301

Mr. Robert M. Post, Jr.
ITS Telecommunications Systems, Inc.
16001 SW Market Street
Indiantown, FL 32956-0277

Susan J. Berlin
NuVox Communications, Inc.
Two North Main Street
Greenville, SC 29601

William R. Atkinson
Sprint Nextel
3065 Cumberland Circle, SE
Mailstop GAATLD0602
Atlanta, GA 30339

Ronald W. Gavilett, Esq.
Neutral Tandem
One South Wacker, Suite 200
Chicago, IL 60606

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
215 South Monroe Street, Suite 700
P. O. Box 1876
Tallahassee, FL 32302

Charles V. Gerkin, Jr.
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346

Michele K. Thomas, Esq.
T-Mobile
60 Wells Avenue
Newton, MA 02459

Charles F. Palmer, Esq.
Troutman Sanders LLP
600 Peachtree Street, N.E.
Suite 5200
Atlanta, GA 30308-2216

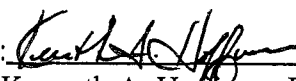
Elaine Critides
Verizon Wireless
1300 I Street, N.W.
Suite 400
Washington, DC 20005

Michael A. Gross, Esq.
Florida Cable Telecommunications, Assn.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Holly Henderson
Southern Communications Services, Inc.
d/b/a SouthernLINCWireless
5555 Glenridge Connector, Suite 500
Atlanta, GA 30342

Todd D. Daubert
Kelley Drye & Warren LLP
1200 19th Street, N.W.
Suite 500
Washington, DC 20036

Leigh A. Hyer
Verizon Access Transmission Services
P. O. Box 110
Tampa, FL 33601-0110

By: 
Kenneth A. Hoffman, Esq.
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Explanation of Exhibit A to Small LECs' Response
to BellSouth Telecommunications, Inc.'s
First Set of Interrogatories (Nos. 1-17)

The Exhibit A to the Small LECs' Response to BellSouth's First Set of Interrogatories is intended to provide examples of calls that demonstrate that the mechanized records provided by BellSouth regarding traffic of third party carriers that BellSouth has delivered to the Smart City Telecommunications, LLC is neither complete nor accurate.

Exhibit A - Page 1 is intended to show examples of calls where BellSouth replaces the originating number with a "Billing Telephone Number." The call records shown in the upper section (as produced by BellSouth) can be compared with the call records in the lower section (as produced by Smart City using special SS7 capabilities). BellSouth provides call records of calls originated by CLECs or CMRS providers in a format whereby the individual call information is separated into groups of calls by carrier. This data includes a "Bill to Number" as the means to identify the carrier. As such, Smart City does not receive the actual calling party number. If one compares the 7th, 8th and 9th columns from the upper section (NPA, NXX and line) with the "Orig Number" column in the lower section, one will see that the actual originating number as reflected in the lower section does not correspond with the NPA, NXX and line number from the upper section. For example, BellSouth shows calls that were originated by NewSouth Comm to Smart City have been originated from (407) 472-0000, while Smart City's sample SS7 data shows calls from NewSouth Comm originating from several actual numbers in different NPA-NXX areas. The lack of actual originating number in the BellSouth records results in Smart City not being able to identify calls or the jurisdiction of such calls with precision. Without this specific information, Smart City's ability to identify, enforce and administer terms and conditions for terminating traffic is significantly limited. [Note: The less obvious abbreviations on this page include CIC/OCN meaning Carrier Identification Code/Operating Company Number; Term Pt Code meaning Terminating Point Code identifying Smart City's network; and JIP meaning Jurisdictional Information Parameter indicating the originating switch for the call.)

Exhibit A - Page 2 is intended to show a list of interexchange carrier access calls that BellSouth is delivering to Smart City over the intraLATA toll trunk group for which Smart City receives no call records from BellSouth. Smart City has identified this list of interexchange carrier calls, but BellSouth has provided no call records.

For Exhibit 1 - Page 3, the top section notes that for one day (January 12, 2006) BellSouth provided call records indicating that 1,870 transited calls were originated by Grande

Communications Networks, Inc. and were delivered to Smart City by BellSouth for termination. (See single line, upper section on Exhibit A - Page 3.) The middle section on that page shows examples of call records from BellSouth that indicate that Grande Communications Networks, Inc. is the originating carrier. However, Smart City is unable to identify or find any calls that were originated by Grande Communications Networks that were terminated to Smart City by BellSouth. Smart City has matched call records from the middle section of Page 3 with terminating calls as shown in the bottom portion of page 3 (based on terminating number, time-of-day, and length of call). Where calls have been matched as identical, the information shows that the originating carrier is not Grande Communications Networks, but five different carriers.

Response: The attached summary shows local/EAS call messages and minutes of use for Smart City Telecommunications, LLC for the months of May, June and July 2005. The traffic summarized in the attachment only includes local/EAS calls that are directed to NPA-NXXs associated with rate center areas served by BellSouth for which Smart City originates local calls (this scope of traffic represents those NPA-NXXs for which BellSouth may perform transit services in addition to the analogous traffic to BellSouth end users). For Smart City, the percentage of transited messages to total messages (for this scope of traffic) was [REDACTED]%, and the percentage of transited minutes of use to the total minutes of use was [REDACTED]%

These percentages are reflective of the time period measured, the extent of CLEC and CMRS provider activity in the relevant local calling area, the status of trunking arrangements between CLECs and CMRS providers and Smart City, etc. These percentages are likely not reflective of any other company, and may not be reflective for different time periods for Smart City. This summary should not be construed to suggest that any treatment of traffic under these conditions is proper or required.

Moreover, the absolute number of minutes of use of transit traffic that BellSouth has billed Smart City and Frontier has already been provided in response to the item 1 -- production of documents in response to Staff's Set II. The exhibit to that response summarizes the transit MOUs billed by BellSouth to these two Small LECs.

TRANSIT TRAFFIC
SUMMARY BY MESSAGE VOLUME

Local/EAS calls originated by Smart City end users and terminated to Rate Center NPA-NXXs
(NPA-NXXs associated with rate centers within the local EAS calling area)

CLEC Call Messages Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
CMRS Providers Call Messages Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
Total Call Messages Transited by BellSouth for three-month period		= [REDACTED]
Total Local/EAS Call Messages to BellSouth end users during same period	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Total	[REDACTED]
Grand Total of all Local/EAS Call Messages to BellSouth/EAS areas		= [REDACTED]
Percentage of Call/Messages transited to CLECs	= [REDACTED]	%
Percentage of Call/Messages transited to CMRS Providers	= [REDACTED]	%
Total Percentage of Local Calls transited to third party carriers	= [REDACTED]	%

TRANSIT TRAFFIC
SUMMARY BY CONVERSATION MINUTES OF USE

Local/EAS calls originated by Smart City end users and terminated to Rate Center NPA-NXXs
(NPA-NXXs associated with rate centers within the local EAS calling area)

CLEC Minutes of Use Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
CMRS Providers Minutes of Use Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
Total Minutes of Use Transited by BellSouth for three-month period		= [REDACTED]
Total Local/EAS Minutes of Use to BellSouth end users during same period	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Total	[REDACTED]
Grand Total of Local/EAS Minutes of Use		= [REDACTED]
Percentage of Minutes of Use transited to CLECs		= [REDACTED] %
Percentage of Minutes of Use transited to CMRS Providers		= [REDACTED] %
Total Percentage of Local Call Minutes of Use transited to third party carriers		= [REDACTED] %