

ORIGINAL

Matilda Sanders

From: Barclay, Lynn [Lynn.Barclay@BellSouth.com]
Sent: Thursday, March 23, 2006 2:15 PM
To: Filings@psc.state.fl.us
Cc: Fatool, Vicki; Linda Hobbs; Nancy Sims; Holland, Robyn P; Bixler, Micheale; Slaughter, Brenda ; Mays, Meredith
Subject: 041269-TL BellSouth's Bayo letter re it's supplement to status of filing interconnection agreement amendments
Attachments: 041269-TL Bayo Letter re supplement .pdf

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 SEC 1
 OTH _____

B. Docket No. 041269-TL: In re: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting From Changes of Law

C. BellSouth Telecommunications, Inc.
 on behalf of Meredith Mays

D. 7 pages total

E. BellSouth Telecommunications, Inc.'s Bayo letter regarding its supplement to status of filing interconnection agreement amendments.

<<041269-TL Bayo Letter re supplement .pdf>>

Lynn Barclay

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DOCUMENT NUMBER-DATE

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3/23/2006

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March 23, 2006

VIA ELECTRONIC AND US MAIL

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

Re: Docket No. 041269-TL

Dear Ms. Bayó:

On March 10, 2006, BellSouth Telecommunications, Inc. ("BellSouth") submitted its initial letter providing the Commission an update as to the status of filing interconnection agreement amendments consistent with Order No. PSC-06-0172-FOF-TP. This letter supplements the March 10, 2006 letter.

BellSouth has provided impacted CLECs in Florida copies of amendments pursuant to Order No. PSC-06-0172-FOF-TP ("Order"). BellSouth's records reflect that, to date, many CLECs have executed amendments or have otherwise made alternative arrangements to effectuate the Order.

BellSouth's records also reflect a number of CLECs that remain out of compliance with the Order and that have not made alternative arrangements to effectuate the Order; specifically, those aspects of the order that require the transition of former unbundled network elements to other serving arrangements. Those CLECs include: Access Integrated Networks, Inc., Awesome Communication, Incorporated, Azul Tel, Inc., DPI-Teleconnect, LLC, Ernest Communications, Inc., Image Access, Inc. d/b/a New Phone, Interactive Services Network d/b/a ISN Communications, KingTel, Inc., Level 3 Communications, L.L.C., Midwestern Telecommunications, Inc., Navigator, New Access Communications LLC, New Edge, North American Telecommunications Corporation, Southern Telecom, Inc., Supra Telecommunications and Information Systems, Inc., Tel West Communications, LLC, Telephone One Inc., US South Communications, Inc., WilTel Local Network, LLC (fka Williams Local Network, LLC), and Winstar Communications, LLC.

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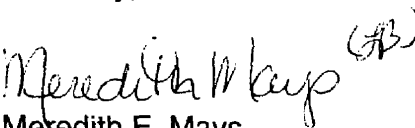
FPSC-COMMISSION CLERK

Ms. Blanca S. Bayo
March 23, 2006
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BellSouth has notified CLECs in Florida that, to the extent these carriers have in service UNE-P arrangements and have not returned signed Florida *TRRO* amendments, that it will begin converting such lines to resale beginning March 27, 2006. A copy of BellSouth's Carrier Notification Letter is attached. BellSouth is also in the process of identifying and notifying affected CLECs that have high capacity loop and transport arrangements in unimpaired wire centers. BellSouth will take steps to convert such facilities as well, which is also detailed in the attached Carrier Notification Letter.

BellSouth is hopeful that, by notifying carriers of these conversions, that CLECs will take the necessary steps to finalize their Florida amendments. BellSouth will provide the Commission with additional updates as needed. BellSouth has served copies of this letter to the parties shown on the attached Certificate of Service.

Sincerely,


Meredith E. Mays

cc: All Parties of Record
Jerry Hendrix
E. Earl Edenfield
James R. Meza, III

626977

CERTIFICATE OF SERVICE
Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U. S. Mail this 23rd day of March, 2006 to the following:

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Meredith Mays

**(+)signed Protective Agreement
(*) via FedEx**



Business Markets

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**Carrier Notification
SN91086053**

Date: March 22, 2006

To: Facility-Based Competitive Local Exchange Carriers (CLEC)

Subject: Facility-Based CLECs (Interconnection/Contractual and Product/Service) – BellSouth-initiated Conversion of Unbundled Network Element-Platform (UNE-P) Service to Resale and the Impact on Certain Services and Features on UNE-P Lines When Converted in the State of Florida

Pursuant to the Florida Public Service Commission's ("FPSC") Order Numbers PSC-06-0172-FOF-TP and PSC-06-0137-PCO-TP in Docket No. 041269-TP, Generic Change of Law Proceeding, BellSouth sent change of law amendments to CLECs whose Interconnection Agreements were not compliant with the Triennial Review Order ("TRO") and the Triennial Review Remand Order ("TRRO") to incorporate the FPSC's ordered contract provisions into such Interconnection Agreements with BellSouth. Although many CLECs returned their signed amendments, there remains a significant number of CLECs who have not returned their executed amendments to BellSouth.

The recommendation approved by the FPSC states: "if CLECs do not identify the applicable embedded bases by March 10, 2006, and by September 10, 2006, respectively, staff recommends that BellSouth should be permitted to (1) identify the arrangements itself, (2) charge CLECs the applicable disconnect charges and full installation charges, and (3) charge CLECs the resale or wholesale tariffed rate beginning March 11, 2006, for local circuit switching and affected high-capacity loops and transport (September 11, 2006, for dark fiber loops and transport), regardless of when the conversion is completed."

This is to advise all Florida CLECs who still have an embedded base of Unbundled Network Element-Platform (UNE-P) in place that, regardless of whether or not CLECs have signed the above-referenced change of law amendment, pursuant to the FPSC's directive, BellSouth will begin converting your remaining UNE-P lines to Resale, and such conversions will begin as early as **March 27, 2006**. Please be advised that if a CLEC does not have a Resale Q account for Florida, and BellSouth is unable to establish one, then that CLEC's UNE-P service will be disconnected rather than being converted to Resale.

Also, UNE-P lines that have Call Forward Busy (CFNB) and/or Call Forward No Answer (CFND) (when not associated with BellSouth Voice Mail service) will be converted to Resale; however, the CFNB and/or CFND features will not transfer to the Resale line. The information that would be necessary to maintain either of those features post-conversion, such as the "forward to" number, is not available on the Customer Service Record (CSR), and is not otherwise readily available to BellSouth.

UNE-P lines with Remote Access to Call Forwarding will be converted to Resale, but a new Personal Identification (PID) number will be assigned by BellSouth and will be automatically sent via e-mail to the CLEC.

Remote Call Forwarding Service that a CLEC may have purchased pursuant to an Interconnection Agreement is a switch-based service that is not associated with any particular UNE-P access line. However, such service is provided via BellSouth's switch. As switching is no longer available under the Interconnection Agreement, Remote Call Forwarding Service is no longer available at Total Element Long-Run Increment Cost (TELRIC) rates. Further, neither the "forward to" numbers nor other information necessary to convert the service to the equivalent Resale service are readily available to BellSouth. Thus, Remote Call Forwarding Services purchased pursuant to the Interconnection Agreement will be disconnected.

In order to avoid disruption of the aforementioned services, BellSouth strongly encourages all affected CLECs to immediately submit conversion requests for remaining UNE-P arrangements. If you do not want your UNE-P arrangements to be converted to Resale, the following options remain available:

- 1) BellSouth's Transitional Market Based Rate ("T-MBR") Agreement is still available; or
- 2) CLECs may convert their UNE-P arrangements to UNE loops using BellSouth's Bulk Migration process.

Pursuant to the same language cited above from the FPSC's decision, BellSouth is compiling a list of high capacity loops and transport in unimpaired wire centers for conversion to tariffed services. Once BellSouth has the list ready, CLECs will be notified as to when BellSouth will commence such conversions. Clearly, it would be advantageous to all if CLECs were to submit orders for such conversions, rather than BellSouth having to initiate the conversions.

If you have any questions regarding BellSouth's plans to begin initiating the UNE-P to resale conversions on March 27, 2006, please contact your BellSouth contract negotiator. If you have questions regarding the potential loss of your end user's service or specific features where the end user has one of the services or features discussed above, please contact your Customer Care project manager.

Sincerely,

ORIGINAL SIGNED BY KRISTEN E. SHORE

Kristen E. Shore – Director
Business Markets