

Marguerite McLean

090430-TP

From: Nmsamry@aol.com
Sent: Tuesday, August 03, 2010 5:55 PM
To: Filings@psc.state.fl.us
Cc: Lisa Harvey; Jerry Hallenstein; Adam Teitzman; ke2722@att.com; kkramer@ststelecom.com; rcurry@ststelecom.com; cdiaz@ststelecom.com; mamarant@ststelecom.com
Subject: Docket No.: 090430-TP - Saturn Telecommunication Services, Inc. v. AT&T Florida
Attachments: LTRTOF~1.PDF

Please see attached letter and exhibits for filing.

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8/4/2010

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August 3, 2010

Ms. Ann Cole, Commission Clerk
Office of the Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Saturn Telecommunication Services, Inc., a Florida corporation v. BellSouth
Telecommunications, Inc. a Florida corporation d/b/a AT&T, Docket # 09-0430
TP

Dear Ms. Cole:

1. Attached for filing, please find letter with exhibits dated August 3, 2010 addressed to Ms. Lisa S. Harvey and Mr. Jerry M. Hallenstein of the Florida Public Service Commission.

We thank you for your kind assistance.

Very truly yours,

s/ Alan C. Gold

ALAN C. GOLD

cc: Mr. Adam Teitzman, via email: ateitzma@psc.state.fl.us and US Mail
E. (Kip) Earl Edenfield, Jr., Esquire, via email: ke2722@att.com and US Mail
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COMMUNICATIONS SECTION
AUG 4 2010
PSC-COMMUNICATIONS SECTION

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August 3, 2010

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Ms. Lisa S. Harvey
Mr. Jerry M. Hallenstein
Florida Public Service Commission
Division of Auditing and Performance Analysis
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 090430-TP: Saturn Telecommunication Services, Inc. v. AT&T
Florida - LEX/LENS

Dear Ms. Harvey and Mr. Hallenstein:

During the last teleconference on July 22, 2010 between AT&T, STS and FPSC staff on the matrix in the above cited docket, STS raised an issue concerning the continued ability of STS and other CLECs to order, through LEX, a migration of its wholesale UNE-P customers to commingled arrangements utilizing the bulk migration process. Based upon objections by AT&T, you questioned whether this issue was properly before the FPSC in the above cited docket or should be raised in another docket. We appreciate you giving us the opportunity to demonstrate in writing that the issue is properly before the FPSC in this docket.

On behalf of my client and my office, please be assured that this is a real problem and not one, as AT&T contends, designed solely to obtain an advantage at the FCC. Since the new processes for commingling were published by AT&T in April 2010, STS has successfully utilized these processes through LEX to (i) convert customers of AT&T and/or another CLEC to STS' commingled facilities via a SL 2 UNE Voice Grade Loop through a single LSR, and (ii) migrate customers of STS being serviced by a wholesale UNE-P arrangement to STS' commingled facilities via a SL 2 UNE Voice Grade Loop through a bulk ordering process (multiple LSRs). To date, STS has not had any problem

with its utilization of either process; however, AT&T has threatened to stop taking STS' orders for bulk migration in LEX and has publicly stated that it should be rejecting STS' bulk orders.

In order to better understand what is presently going on, it is necessary to give a brief history. In late 2006, AT&T and STS entered into a confidential settlement agreement. As part of that settlement agreement, AT&T created a process called the Bulk Migration Work Around Process ("WAP")¹. This process was supposed to allow STS to migrate up to 2500 lines then serviced through a Wholesale UNE-P arrangement with AT&T to STS commingled facilities using SL 2 UNE Voice Grade loops. AT&T agreed to use its best efforts to migrate the 2500 lines by the end of March 2007. The WAP provided access to existing UNE and UNE combinations and number portability (REQTYP B with number portability) and was limited only to STS and therefore not available to any other CLEC (see Exhibits "A" and "B" attached). Prior to April 2010, the only other process for commingling available to other CLECs in Florida was for new loop orders without number portability, and access to existing UNE and UNE combinations was not available. This process was of no value. AT&T never filed the settlement agreement with the FPSCS in violation of 47 USCA § 252,² and never published the WAP. In fact, AT&T's sole purpose for developing the WAP was to improperly exclude the process from SQM performance measurements and SEEM remedy payments. The WAP never worked and was not a viable option for STS. In fact, due to its defects, STS has not placed an order using the WAP in well over a year. Some of the reasons that the WAP did not work were all of the limitations that AT&T imposed on the process, such as limiting the conversions to as little as two lines per day at certain serving wire centers ("SWC"); limiting the number of SWCs to which STS could commingle to a few; not allowing the use of the Bulk Migration Scheduling Tool; not allowing a valid BOPI³ to be utilized on the order; and not allowing for after hour hot cuts or "time specific" coordination. STS agreed to the conversion of 2500 lines utilizing the WAP because it was anticipated that by the end of March 2007, when 2500 lines were converted, AT&T would have perfected a permanent process available to all CLECs through their ICAs. STS did not realize that it would take AT&T until April 2010 to publish a process and, only then, with the intervention of the FPSC.

¹ The WAP allowed STS to re-use existing facilities such as a voice grade local loop with number portability for Commingling with special access transport. AT&T only allowed STS access to such a UNE with number portability, and denied all other CLECs this access until April 14, 2010.

² 47 U.S.C. A. § 252 Procedures for negotiation, arbitration, and approval of agreements. (a) (1) Voluntary Negotiations.—Upon receiving a request for interconnection, services, or network element pursuant to section 251, an incumbent local exchange carrier may negotiate and enter into a binding agreement with the requesting telecommunications carrier or carriers without regard to the standards set forth in subsections (b) and (c) of section 251. The agreement shall include a detailed schedule of itemized charges for interconnection and each service or network element included in the agreement. The agreement, including any interconnection agreement negotiated before the date of enactment of the Telecommunications Act of 1996, shall be submitted to the State commission under subsection (e) of this section. (e) APPROVAL REQUIRED (2) GROUNDS FOR REJECTION.—The State commission may only reject—(A) an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that—(i) the agreement (or portions thereof) discriminates against a telecommunications carrier not a party to the agreement;

³ BOPI (Bulk Ordering Project Identifier) allows the order to be captured in the SQM warehouse and evaluated against the SEEM metrics. The BOPI also allows the order to be Project Managed by the CCPM group.

Given the above historical perspective, the events during our last teleconference on the matrix should make sense. Since April 2010, STS has been successfully placing bulk orders in LEX through the published processes available to all CLECs. In order to maintain its position at the FCC, AT&T claimed, *albeit* incorrectly, that STS was not using the published processes but rather the WAP. That is why Geoffrey Klineberg (AT&T's Washington attorney) advised you that bulk migration for commingled arrangements was only available to STS and to no other CLEC. On the other hand, during the same telephone conference, Kip Edenfield said that the Bulk Migration Process was available to any CLEC who desired to use it. Those two positions cannot be reconciled and should be clarified.

Before demonstrating that this issue is on the correct docket, I want to assure you that this is a very real practical concern and not just theoretical. First, AT&T has stated that STS is using the wrong process and has threatened to stop future orders⁴. Placing orders through the bulk migration process has allowed STS to obtain a valid BOPI, which allows said orders to be project managed, be scheduled for after hours hot cuts and, be captured and measured from a performance standpoint for the purposes of SEEM remedy payments (If you recall, STS resolved its complaints on docket 000121-TP in return for AT&T agreeing to additional performance measurements for commingled arrangements). More importantly, the orders placed through the published bulk processes have been smooth and successful. On the other hand, due the restrictions and limitations AT&T placed on the WAP, it is worthless. Moreover, AT&T cannot successfully provision an order through the WAP.

In the PAA issued April 26, 2010 in this docket, Order no: PSC-10-0253 PAA-TP allowing AT&T to retire LENS under certain conditions, this Commission imposed four conditions upon AT&T. These conditions are found on page 10 of the PAA. Only conditions 3 and 4 are relevant to the instant matter:

- "3. AT&T shall update all appropriate CLEC documentation for commingled orders via the LEX interface; and
- 4. AT&T, STS and staff shall work together to resolve the specific LEX ordering issues raised by STS in the March 1, 2010 matrix"

In Line number 10 to the "Matrix" referenced in the PAA, AT&T's response stated, "LEX REQ TYP B ACT V LSR **Commingled with Bulk Migration** and REQ TYP ACT V migration of EU to Commingled UVL-SL2 Loop with Number Portability were successfully demonstrated on January 22, 2010; other product arrangements were not requested. '**Conditional**' Notes have been modified in the 9-State LSOR VOL II, 4/27/10." (emphasis added) (copy attached as Exhibit "C")⁵

⁴ If according to Mr. Edenfield the process that STS is using is available to all CLECs then this threat would affect all CLECs operating in Florida. On the other hand if Geoff Klineberg is correct and the WAP is available only to STS, and STS is using the WAP *albeit* incorrectly since STS obtains a valid BOPI, instead of a fake BOPI, then the threat by AT&T would only affect STS.

⁵ Prior to April 2010 AT&T did not provide to any CLECs operating in Florida (with the exceptions provided in the Settlement Agreement between AT&T and STS) access to existing UNE and UNE combinations commingled with special access whether voice grade loops or otherwise, with number portability either as a standalone Local Service Request (LSR) or multiple LSRs in a Bulk Arrangement.

AT&T's response to item 10 in the Matrix identified the Bulk Migration Process, not the WAP. No mention is made of the WAP. Moreover, the WAP is not published anywhere and is available to no CLEC other than STS. This commission ordered that LENS could be retired based in part on AT&T resolving issuing in the Matrix and on updating CLEC documentation for commingled orders. AT&T resolved item 10 of the Matrix by making certain processes, including bulk migration, available to all CLECs. Now that LENS has been retired, AT&T is backsliding and depriving STS and all CLECs in Florida of the advantages of ordering commingled arrangements that staff recommended in the audit and the Commission ordered in the PAA.

Moreover, in order to resolve the issues in the PAA and avoid a protest, STS and AT&T reached a settlement, the terms of which are contained in three e-mails (copies of all 3 e-mails are attached hereto as Composite Exhibit "D"). In my e-mail to Kip Edenfield on May 14, 2010 at 1:09 pm, I inquired about the limitations for ordering commingled arrangements through LEX including the bulk migration process, and state, "Although we disagree with AT&T's position we are not asking you or the FPSC to interpret the Confidential Settlement Agreement. **The only limitations we are talking about are those limitations applicable to all CLECs** who have appropriate language in their ICAs and wholesale agreements which allow them to do commingling including without limitation Voice Grade Loops with Special Access Transport" (emphasis added). My e-mail could not have been clearer; we were not referring to the WAP, but the processes available to all CLECs.

Kip Edenfield responded to my e-mail the same day, acknowledging the above e-mail as well as another e-mail stating, "Based upon AT&T's most recent processes, there are no specific provisioning limitations for designed commingled circuits other than those generally applicable for EELs and other designed circuits. **For Bulk Migration** (Single LSR/Bulk Arrangement) CLEC Information Package, Section 6 '**Bulk Migration Options**' and Section 8 '**Bulk Migration Scheduling Tool**' for limitations per day" (emphasis added). Mr. Edenfield did not mention the WAP and based on my letter, to which his was responding, could not have been talking about the WAP since it is only available to STS. Mr. Edenfield clearly represented that Bulk Migration for commingled arrangements was available to all CLECs. Based on these promises by AT&T, STS believed that it had the ability to order commingled arrangements in LEX, both through single LSRs as well as through a publically available bulk migration process, and did not believe it necessary to protest the PAA. Now AT&T is denying that it ever made these representations to either STS or the FPSC, claiming that the newly published processes do not mean what they say, alleging that STS was confused and mistaken when it successfully ordered commingled arrangements in Bulk after the new processes were published, and stating that no CLEC except STS can order commingled arrangements in LEX through bulk orders. This leaves STS relegated to using a defective process that was intentionally designed by AT&T to avoid its obligations of SQM performance measurements and SEEM remedy payments.

Now that AT&T has retired LENS, it is backing down on its promises to both STS and the FPSC. In the responses to the Matrix and in order to avoid a protest, AT&T represented that the Bulk Migration Process for commingling was available throughout the 9 (nine) states, including Florida. During our telephone conference, Mr. Edenfield represented any CLEC could use bulk migration and questioned the sincerity of STS'

claim because STS was successfully using the process. However, after our teleconference, AT&T threatened to shut the process down. On top of this threat, it is revealing that Mr. Geoff Klineberg said, in contravention to Mr. Edenfield's above-referenced statement, that bulk migration for commingled voice grade loops was only available to STS through the WAP and to no other CLEC.

AT&T has recently published in April, 2010 *Migrations to Commingled UNE SL 2 voice grade loops with Number Portability* and in May, 2010 *The Bulk Migrations Process* (Bulk Migration). STS believes it is using the newly published processes to order commingling in bulk. AT&T apparently claims otherwise; however, it is difficult to understand what AT&T is claiming because AT&T changes its story depending on the circumstances and forum.

At a minimum, STS, other CLECs in Florida and the FPSC should know once and for all what processes are available to all CLECs in Florida for ordering in LEX regarding commingling. It is clearly relevant to conditions 3 and 4 of the PAA and a central issue in this docket. While AT&T tries to confuse the issue in order to avoid dealing with it in this docket, this matter belongs in this docket and should be addressed and resolved herein.

I have tried to keep the documentation to a minimum. I debated about providing you the declaration of Frederick Christensen, AT&T's expert who claims that STS is not using the Bulk Migration Process, but rather the WAP, and that by all rights STS' orders should be rejected. I decided against it at the present time as the document is lengthy and I doubt AT&T would contest the above. If you desire Mr. Christensen's declaration or any supporting documents, please do not hesitate to ask.

Thank you for your attention to this matter.

Very truly yours,



ALAN C. GOLD

Attachments

cc: Mr. Adam Teitzman, via email: ateitzma@psc.state.fl.us and U.S. Mail
E. (Kip) Earl Edenfield, Jr., Esquire, via email: ke2722@att.com and U.S. Mail
STS Telecom, via email

UNE - UNE-P to UNE Loop Commingling

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Introduction

Purpose

This document provides work instructions to the LCSC Service Reps on how to process requests for a UNE-P to UNE Loop Commingling.

Version Information

Converted SOE from Word to verbatim.

Table A. Revision History

Chapter	Action Request #	Date / Issue	Description	Change Requested By / Made By
Service Order Exhibits	N / A	January 31, 2007 / 1_corrected	Converted SOE from Word to verbatim.	Danny Mann
All	N / A	November 30, 2006 / 1	Initial Issue	Tina Berard / Kerl Lynn Morgan / Lynn P. Burkett

Chapter 1. Overview

1.1 Overview



ATT109872

A Commingled circuit allows for a UNE Loop to be connected to a wholesale service. For purposes of connecting UNE Loops, commingling will be defined as a stand-alone Unbundled Loop connected to a BellSouth Wholesale Tariff service

The CLEC must establish the higher-level Special Access (SPA) and associated multiplexing equipment in the same SWC where the local loop will terminate.

The Central Office Channel Interface (COCI), which includes the low speed card and jumper, will be a part of the UNE Loop order. The COCI replaces the collocation cross-connect.

The Commingled DS0 Loop will be terminated to the MDF and then connected, using the appropriate DS0 COCI, to the DS0 side of a D4 Channel Bank.

The same features and capabilities allowed for the DS0 analog Loops will also be allowed for the Commingled Loop including reuse of facilities (when available) as with this process.

The UNE Loops that are commingled with SPA services will continue to be supported by the same processes and centers as the loops are today. There is no difference in the way the UNE Loop is provisioned except that the UNE Loop is delivered to the CLEC at a Mux or D4 Channel Bank in the EU SWC instead of a Collocation arrangement. The same UNE Loop capabilities, measurements and options will apply to the Loop circuit portion of the commingled circuit.

Chapter 2. Applicable States/Effective Dates

2.1 Applicable States/Effective Dates

UNE-P to UNE Loop Commingling is available only in 1 state and for 1 CLEC.

Note: The CLEC must have the appropriate rate elements (USOC's) in their Interconnection Agreement.

State	Applicable	Effective Date	CLEC	Company Code
Florida	Y	November 2006	STS	645A

Chapter 3. LOH (Local Ordering Handbook)

3.1 Ordering, Data Dictionary, Due Date Interval Guide

To view the current version of the LOH, please click below:

[LOH \(Local Ordering Handbook\)](#)

Chapter 4. Restrictions/Requirements

4.1 Product Restrictions

The following items are not available for UNE Loop Commingling:

Product Specific
SIG does not apply.
Mileage does not apply to this product.
Service Inquiry form (SI) is not needed.
Product not to be used to provision wireless service.
Cable & Pair is not applicable for this product, but will be used to submit the order via LENS

T3TIE CFA is not applicable for this product.

SAW does not apply.

4.2 Billing Information

The following table shows the restrictions and/or requirements that pertain to billing information.

Billing	Applies (Y/N)	Special Instructions
Minimum Bill Requirements	Y	A minimum of one month of billing/billed in CABS
Billing Guarantees	N	No action needed by service rep
Additional Information: Y=YES, N=NO		

4.3 Order Charges

The following table shows restrictions and/or requirements that pertain to ordering charges.

Charges	Applies (Y/N/C)	Special Instructions
Manual Coordination	Y	Manual Coordination is included in the one (1) time non-recurring charge.
SOMAN/SOMEK	Y	SOMEK only Link to Matrix of Applicable Charges by State
Expedite Charges	N	Click HERE to learn more about Expedite Charges.
Overtime Rates	N	Overtime rates apply for work outside of 8:00 AM and

5:00 PM local time

ADDITIONAL INFORMATION: Y=YES, N=NO, C=CONDITIONAL

4.4 LSR Requirements

LSR Requirements		
Section	Item	Definition
LSR	CC	645A
	BAN1	CABS BAN for Loop
	BAN2	Listing Q Account
	REQTYP	BB
	ACT	V
	NC Codes	STS will submit NC Codes for a non-Commingled SL2 Loop.
LSNP	Cable ID	PXXX1
	Pair	00
RMKS	CFA	STS will provide a CFA in Remarks. The format will either be ST01. Ex: 88888 ST01 3 CLMBGAMTWD1 RSWLGAMA

Additional Information: Any other entries are considered business as usual.

4.5 Service Order Requirements

Order Requirements		
Section	Item	Definition
IDENT	SPO	Service Provisioning Overall Measurement contains 4 to 5 alphanumeric, recapped on CABS "C" type service orders. See SPO chart below for more information.
	AECN	Required on Designed Service Orders. This information is placed in the Unfiled Ident section of the service orders.
	ACTL	The ACTL the CLEC submits on the LSR will be 11 characters. It will be the ACTL CLI of the BST wire center where the CLEC is collocated.

	APPT	An Appt (appointment) Code is required on UVL-SL2 loop order. Click here to learn how to apply the correct Appt Code to the order.
	BCS	The Basic Class of Service used on the order will be: NTCVG - Voice Grade Loop
	FDT	Frame Due Time: If you are unsure which FDT to use, please refer to the FDT Requirements for UNE Orders document by clicking: UNE-FDT Requirement for UNE Orders
S&E	SOME C	SOME C will always be on the order.
	NC Code	Same NC Code from LSR
	NCI Code at CKL-1	
	NCI Code at CKL-3	Same as from LSR
	CKL Locations	<p>Commingled Loop orders will have 3 CKL locations:</p> <ul style="list-style-type: none"> • CKL1 Address of BST central office • CKLT2 End User SWC CLLI (also known as MUX) <p>CKL3 End User Address</p> <p>Note: If the CFA is a T3Z, a CKLT will be needed. The End User address will then become CKL3.</p>
	XPOI	This FID is floated at CKL1 and is the ACTL EXAMPLE: /XPOI AGSTGAMTXFX
	CKLT	The data that follows the CKLT 2 is the 8 character CLLI code of the End Users SWC. EXAMPLE: IG2 CKLT 2-RSWGAMA
	CKR	A field from the LSR. The CKR is used by CPG on the Design Layout Report (DLR) that is sent to the CLEC. Additionally, CWINS and I&M can use the CKR during testing.
CFA	The CLEC will provide a CFA in Remarks. The format will be ST01	

		The Cable ID and Pair generated on the Loop order needs to be deleted and the CFA from Remarks added to the S&E.
	Circuit ID Format	The circuit ID for the type of Commingled Loop ordered will be the same as a non-commingled DS0 level loop. EXAMPLE: 38.LYFU.123456..SB would be used for the SL2 Commingled Loop for these orders.
	WACD	This FID will be used on ALL Commingled Loop orders. It is floated at CKL1 on the order. /WACD Commingled Non Transpt is used on all new Commingled Loop orders.
RMKS	Remarks section of Order	If a service rep needs to update a pending service order, the service rep should always update the remarks section of the order to explain what was done: .Ex: 12-11 Updt ordr to chng dd per sup 2.....Tina

Additional Information: Please refer to service order exhibits contained in this document for service and equipment formats specific to this product.

Table B. SPO Codes

SPO Codes		
First Character	M	Used for Adds or Rearrangements
	N	Used for Disconnects
...		
Second Character	F	ALWAYS
...		
Third Character	X	ALWAYS
...		
Fourth and Fifth Character	Number of Circuits being Added, Rearranged or Disconnected.	

Chapter 5. Types/Options

5.1 Types

Only one type of Commingled Loop is available for this process:

- 2 Wire Unbundled Analog Voice Designed (SL2)

5.2 Options

There are no additional options available at this time.

Chapter 6. Validations

6.1 Validations

Note: When validating a CFA of (T3Z) if the NC codes does not match on the LSR, please clarify.

Please click below to link to the validation process documents:

Process
Address Validation
ORION User's Guide
BAN Verification
LCSC Toolkit Job Aid

Chapter 7. Forms

7.1 Forms

The following forms are required to be sent by the CLEC:

- Local Service Request
- End User Form
- Loop Service Number Portability Form

Note: A Service Inquiry (SI) form is not needed for this product.

Chapter 8. Collocation Verification

8.1 Collocation Verification

Follow these steps for determining if collocation is physical or virtual:

- Log into appropriate TN3270 site
 - Clear the screen and type **/ICLOC screen**
 - Type the 11 character ACTL CLI in the Location CLI Field
 - Hit PF1
 - Look in the Type Field
 - If a C is populated, use physical collocation USOC
 - If anything besides a C is populated or is blank, use virtual collocation USOC
-

Chapter 9. Exact Programming

9.1 Project Code

The project code to be used in EXACT depends on the product being ordered.

The Loop order should be generated electronically, but if an order must be issued manually through EXACT, the following Project Code should be used:

- NTCVG

[Click here to access the UNE-EXACT Programming document in CDIA for a complete list of codes.](#)

Chapter 10. NC Code Matrix

10.1 2 Wire Voice Grade Commingled Loop

NC Code	NCI Code	SECNCI Code
LY—	04DS9.15 04DS9.1K 04DS9.15B 04DS9.1S	02LS2 02GS2 02RV2.T

Note: The same NC Code and SECNCI Codes that are applicable to a Non-Commingled Analog Voice Grade Loop (SL2) are applicable to the Commingled Loop. Only the NCI Code is different.

10.2 4 Wire Voice Grade Commingled Loop

NC Code	NCI Code	SECNCI Code
LY—	04DS9.1 04DS9.1K 04DS9.15 04DS9.1S	04LS2 04GS2

Note: The same NC Code and SECNCI Codes that are applicable to a Non-Commingled Analog Voice Grade Loop (SL2) are applicable to the Commingled Loop. Only the NCI Code is different.

Chapter 11. USOC's

11.1 Unbundled Voice Grade Commingled USOC's

Commingled Voice Grade Loop USOC's			
BCS	USOC at CKL 1	USOC at CKLT2	USOC at CKL 3
NTCVG	HTN	1D1VG	UEAL2 for 2 Wire UEAL4 for 4 Wire

Chapter 12. Project Management

12.1 Project Management

All LSR's will be sent with a pre-assigned Due Date.

Click the following to learn more about Project Management: [Project Management Guidelines \(CDIA\)](#)

To obtain a list of contacts click [Project Management Website](#)

Chapter 13. CRO, RRSO, and SEQ

13.1 CRO, RRSO, and SEQ

Please click below to view CRO, RRSO, and SEQ document:

[CRO, RRSO, and SEQ](#)

Not intended to be a complete Service Order Exhibit, please fill in appropriate fields.

<pre>SR RG VN 001 SI 770422 RC MOD PD - - AC N TI SOI RG TN *** ** SA CC *** CD - - EX AD - - HU 0000 ID 00-00 ORD C***** CS NTCVG SLS YXQ*** DD - - AC AP MA ()</pre>	<p>AP=W, L or x (see appointment code document) BCS = NTCVG</p>
<pre>---IDENT LAT SFO MFX* ZRTI \$,QS,800 773-4967,***,205714 ADSR IAECN 645A, NTCVG EDT 8888</pre>	<p>SFO=Check SFO doc under UNE Reference Links to confirm correct SFO code. ***=Service Rep initials</p>
<pre>---LIST ACN CLEC Name ACA 1-ACTL's Address ACTL 1-ACTL from LSR</pre>	
<pre>---CTL SID ***-**-**/LAM **-**-** /DLRD ***-**-** RID -**-**-**/DVA **-**-** WOT ***-**-**/PCD **-**-** PTD ***-**-** WCO CIS/OCO *** ECO *** DSG IMP SLSN LCSC Rep Name/CTN 800 ***-**-**</pre>	
<pre>---BILL IPON ***** MAN US&A</pre>	<p>PON=Retrieve from LSR MAN=ST'S CompanyCode</p>
<pre>---S&E IG1 CLS ** LYTU ***** /NC ** /CR ***** PIU 0/PLU 100 /SSP/***** II *****</pre>	<p>CLS=Circuit Id NC=Use NC code from LSR CR=Use CR from LSR if new loop. BCS = NTCVG</p>

Chapter 14. UNE – Order Reference Links

14.1 UNE – Order Reference Links

For information on Routing Codes, Switching Indicators, System Request Codes, Disconnect Reasons, Appointment Codes, Service Inquiry forms and FPI Indicators, please click below:

For more detailed definitions of the previously mentioned terms, click below to view the TR73572 Expanded Interconnection Services DS1 and DS3 Level Network Interface Specifications:

[UNE – Order Reference](#)

Chapter 15. Quick List of Service Order Exhibits

15.1 Quick List of Service Order Exhibits

Exhibit Number	Description
Exhibit 1	New Install with CFA

Chapter 16. Service Order Exhibits

16.1 Exhibit 1: UNE-P to UNE Commingled Loop

To view additional information on USOCs, refer to the [DS1 Interface USOC Table](#).

This exhibit represents the UNE Commingled Loop order portion of the UNE-P to UNE Commingled Conversion.

<pre> SUB 1-*** ** IG2 CKL 1-POP Address, City, State /LSO *** **/TAR ***,*** /NCL *****/ /CFA *** ** * POPCLLCode MUXCLLCode /ZNEA /ACTL * /XPOI POPCLLCode /WACD COMMINGLED NON TRANSP I1 HTN IG2 CKLT 2 - ***** I1 **** SUB 2-*** ** IG2 CKL 3-End User Address, City, State /LSO *** **/TAR ***,*** /SN End User Name /NCL *****/ /TAR ***, ***/LCON End User or CLEC IMPCON NPA NXX-**** I1 UEAL2 /LSO I1 UNECN/ZRCI CLEC Name, *** *- ****, CLEC IMPCON Name I1 DND I1 SOME C </pre>	<pre> CFA=Retrieve from Remarks on LSR ACTL=* same as ACTL number in LIST section CFA = ST01 CKLT2 = First 8 characters of the ACTL This USOC will be: 1D1VG Refer to Chapter 12 SEC NCI=Retrieve from LSR USOC at CKL-3 are same as the non- comingled version of the type of loop....UEAL2....Refer to Chapter 12 DND used for UNE-P to UNE Comingled Conversion. </pre>
<pre> ---RMKS RMK Comingled Loop </pre>	

Chapter 17. UNE SOR Checklist

17.1 UNE SOR Checklist

Please click below to view the SOR checklist for this product:

[UNE SOR checklist](#)

Chapter 18. MSOC

18.1 Clairvoyant - MSOC Module Job Aid

To view information on ESM, Activity Summary and Details, MSOC Tally Sheets, DWOR, and MOR, please click below to view the Clairvoyant - MSOC Module Job Aid:

[Clairvoyant - MSOC Module Job Aid](#)

18.2 MSOC Job Aids

Please click below to view the MSOC Job Aids:

To view information on Basic, Fundamental and Advanced MSOC Job Aids, please click below to view these job aids:

[MSOC Job Aids](#)

Chapter 19. Definitions & A.K.A.'s (Also Known As)

19.1 Terms and Definitions

Term	Definition
COCI	Central Office Channel Interface

SPA	Special Access
COM	Commingled
DSX	Digital Cross Connect
OC-TS	Order Coordination-Time Specific
LCM	Local Contract Manager
LSM	Local Support Manager
IOF	Inter Office
ICSC	Interconnection Carrier Service Center
ACAC	Access Customer Advocacy Center

Chapter 20. Frequently Called Numbers

20.1 Frequently Called Numbers

Center	Contact Information
AFIG	<u>AFIG Job Aid</u>
Center Contacts	<u>Center Contacts</u>
Employee Locator	<u>Employee Locator</u>
SAC	<u>Service Advocacy Center</u>
WMC	<u>Work Management Center</u>

Chapter 21. FAQs & Troubleshooting

21.1 FAQs

This section is currently under construction. If you have any information relating to the topic please submit via the Action Request System (AR).

21.2 Troubleshooting

This section is currently under construction. If you have any information relating to the topic please submit via the Action Request System (AR).

21.2.1 Maintenance & Repair

Maintenance and Repair issues will be handled thru the CWINS center.

Chapter 22. Quick Reference Links

22.1 Quick Reference Links

For links to the most common look up tools, (USOC Look Up Tool , NC NCI Codes, etc.), please select below:

[Quick Reference Tools](#)

Chapter 23. Corrective Action / Feedback

23.1 Corrective Action / Feedback

Corrections to this document should be submitted via the ISO approved Action Request System (ARs). Please click [here](#) to access the AR system via the Interconnection Gateway.

 [back to top](#)

Last Updated: January 31, 2007



Bulk Migration Process

Bulk Migration
(Bulk Single LSR Arrangement)

Migrations to Commingled UVL-SL2 Loop process

for

STS





Bulk Migration Process

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Bulk Migration Process

1. Introduction & Scope

This Product Information Package is intended to provide STS with information specific to a Bulk Migration Process that allows STS to migrate UNE-P/WLP lines to commingled UVL-SL2 Loops. This process is limited to 2,500 UNE-P/WLP migrations to commingled UVL-SL2 Loops.

2. Contract Requirements

Before the migrations begin, STS must have an executed Interconnection Agreement (ICA) that includes terms and conditions for the Bulk Migration of UNE-P/WLP lines to UNE Loops (UNE-Ls). The ICA must also include the terms, conditions, rate elements and rates for the UVL-SL2 Loop to which service is migrated. The agreement must also include the terms and conditions for Commingling. Further, STS must have executed a Settlement Agreement with AT&T providing for the migration of 2500 UNE-P/WLP lines to commingled UVL-SL2 Loops as described in such Settlement Agreement.

3. Service Description

An electronic bulk migration process may be used by STS when migrating existing multiple non-complex UNE-P/WLP lines, as described in this document, to commingled UVL-SL2 Loops. This requires STS use the 'Bulk Single LSR Arrangement (BSLA)' process to migrate its multiple UNE- lines. The BSLA process allows migration of multiple non-complex UNE-P/WLP circuits by submitting single Local Service Requests (LSRs) in a bulk arrangement. All orders in a BSLA will be project managed by an AT&T Local Wholesale Support Manager (WSM).

See Attachment 1 for the UVL-SL2 commingling scenarios.



Bulk Migration Process

4. Bulk Migration Requirements

Major requirements for the BSLA process are listed in the table below. For complete requirements and instructions, refer to the **Local Ordering Handbook (LOH)** Section 3 Ordering: REQTYPE B – Bulk Migration Process section and LNP BSLA – Designed Analog Loop section

Requirements

- a) The Bulk Migration process is available for migrating existing STS non-complex Port/Loop Combination services to UVL-SL2 Loop with Local Number Portability (LNP).
- b) A UVL-SL2 will be provided with each ported telephone number formerly associated with the UNE-P/WLP Service.
- c) Complex UNE-P/WLP accounts cannot be migrated pursuant to this Bulk Migration process. Examples of Complex UNE-P/WLPs are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P/WLP Centrex, Digital Direct Integration Termination Service (DDITS), etc.
- d) UNE-P/WLP lines subject to this process can be migrated to the UVL-SL2 Loops listed in the UNE-L USOC, Section 9 of this document.
- e) Service orders that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status on Due Date -4 days, must be cancelled by the CLEC and removed from the Bulk Arrangement.
- f) All Existing Account Telephone Numbers (EATNs) must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- g) Each EATN requires a single LSR. If there are multiple EATNs per wire center, then all LSRs may be submitted in the same Bulk Arrangement.
- h) All EATNs in a BSLA must be served from the same AT&T end-user serving wire center (EU SWC).
- i) The SPA DS1 Interoffice Transport facility intended for commingling must be in place prior to UVL-SL2 Bulk Migration orders being submitted; the DS1 Special Access (SPA) Transport multiplexer must be in the EU SWC.
- j) The due dates must be the same for each LSR in a BSLA. Due dates will be assigned by AT&T. (see section 7-Bulk Migration Submission/Flow Process)
- k) Each order in a BSLA requires the same Bulk Order Package Identifier (BOPi). The BOPi will be placed on each LSR in a BSLA. (see section 7-Bulk Migration Submission/Flow Process)
- l) No end-user moves or changes of address will be allowed.
- m) UVL-SL2 Non-Recurring rates from STS's Interconnection Agreement will be charged.
- n) Service order charges for mechanized orders (SOMEc) will be charged based on the current rules for individual LSRs.
- o) The number of EATNs per BSLA and installation due dates will be established by AT&T prior to STS submitting its bulk LSRs.
- p) Order Coordination-Time Specific option is not available.
- q) Firm Order Confirmation (FOC) will be sent for individual LSRs.
- r) All LSRs for a specific bulk package must be successfully received within four (4) hours from when the 1st LSR is submitted. (see Note in Section 6 for the LSR NOR field)



Bulk Migration Process

5. Bulk Migration Options

5.1 Order Coordination (Coordinated Hot Cut)

- Order Coordination (OC) is available in situations where the UVL SL2 is provisioned over an existing circuit that is currently providing service (reuse of existing facilities) to the end-user.
- OC is included with price of the UVL-SL2 and will not result in a separate OC charge.

5.2 Pre and Post Order Completion Restoral Process (or Throwback Process)

- The restoral process (also referred to as a throwback process) is available at the CLEC's request due to out-of-service issues and when the CLEC requires a restoral/throwback back to the UNE-P/WLP (the restored service will be returned to the original service the CLEC had before the migration).
- *The restoral/throwback process can only occur within a twenty-four (24) hour window of the UNE-L order Due Date.*
- The CLEC will follow the requirements in 5.2.1 or 5.2.2 below.

5.2.1 Coordinated 'Completed' UNE-L order.

- CLEC submits LSR to the Local Service Center (LSC) using the documented expedited email process found at the following address: <https://clec.att.com/clec/hb/shell.cfm?section=501>
- The LSR Package requesting a throwback to UNE-P/WLP must contain the following information:

LSR Fields	Field information
LSR Remarks	Special Handling, Restoral UNE-L to UNE-P/WLP
REQTYP	M
Local Service Request Page	ACT = V MI = C, D
Port Service Page	LNA = V, G FA=N UNE-P/WLP Telephone Number
Port Service Page - ECKT Field	UNE-L associated Loop Circuit ID
Directory Listing	Fill out as any other ACT=V migration request
EXP	Y

- The CLEC must advise the AT&T WSM of the restoral/throwback request.
- UNE-P/WLP Non-Recurring, Recurring and Expedite rates will be charged if applicable.

5.2.2 Coordinated 'Not Completed' UNE-L Order

- CLEC calls the CSPC to request restoral/throwback to the UNE-P/WLP and if the number porting has been completed, the CLEC requests port-back activity.

Refer to the CSPC (Formerly known as CWINS) Location and Hours web site for CSPC telephone numbers.

- Orders will be placed in Missed Appointment (MA) status.



Bulk Migration Process

- CLEC submits supplemental (sup) order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV).
- The CLEC must advise the AT&T CCPM of the restoral/throwback request.

6. Bulk Migration Submission/Flow Process

BSLA requests must be submitted according to the LSR guidelines contained in the LOH and the LENS/LEX Guide. Refer to the LSOR for LSR field level information. Below are the steps in the process:

Submission/Flow Process steps

- 1) STS will prepare a spreadsheet that contains the end-user serving wire center (EU-SWC) CLLIs with the number of UNE-P/WLP circuits per CLLI (EU-SWC).
- 2) The spreadsheet will be submitted to STS's Local Wholesale Support Manager (WSM).
- 3) The WSM will coordinate with Network and the LSC to assign due dates for the migrations from each EU-SWC.
- 4) The WSM will return the spreadsheet to STS with the number of EATNs per BSLA and the target due dates per CLLI which STS will use to populate the due date on the bulk migration LSRs.
- 5) STS submits single LSRs* to the bulk ordering system.
- 6) Orders will fall out to the LSC for manual handling to complete the commingling order.
- 7) Once the service order is in the system error free, then the ordering & provisioning process is business as usual.

*Note: In addition to the standard LSR information found in the LOH/LSOR, STS will use the following information when preparing the Bulk Migration LSRs:

LSR Field	Requirement
REQTYPE	BB
ACT	V
BOPI	This is a 12 character Bulk Order Package Identifier (BOPI). The 12 character BOPI is made up of the following and is required for each BSLA: <ul style="list-style-type: none">- Positions 1-8 will always be "COMMNGFL" for all BSLA orders- Positions 9-12 will be unique for each BSLA and will be formatted as 0001, 0002, 0003, etc. (a different number is required for each BSLA) The same BOPI is required on each LSR that is part of the same BSLA.
PRJID	12 character BOPI plus the word 'BULK' for a total of 16 characters
NOR	This field is used to identify the number of LSRs in the same BSLA. The format will be 01XX with XX being the total number of LSRs. This will be populated in the NOR field for each LSR in a Bulk Arrangement. The NOR field may not have any duplicate values. For example, 0420 in 2 or more different LSRs in the same package with the same BOPI will not be allowed. If this condition is met, then the 2 or more LSRs in violation will be returned to the CLEC with the error message: 'Duplicate values in NOR field not allowed for Single LSRs in a Bulk Arrangement'.



Bulk Migration Process

LSR Field	Requirement
	<p>The initial LSR identified by the NOR value of 01XX establishes the Wire Center and the NC code sets for all remaining LSRs in the arrangement.</p> <p>The Project field and the NOR fields will be used to relate the LSRs and identify the number of LSRs in a Bulk Arrangement.</p> <p>STS may not submit more LSRs than the NOR value indicates.</p> <p>Reset Process in a single BSLA</p> <ul style="list-style-type: none"> - In the event STS needs to reset the quantity of LSRs to be processed for a single bulk package, STS shall resubmit the LSR with the 01XX NOR value to indicate the new total of LSRs in the package. - The NOR quantity can only be decreased but can not be increased. An increase in the number of LSRs in the package will require the entire package of LSRs to be cancelled and a new entire package must be submitted. - The system shall renumber the NOR field of the remaining successfully submitted LSRs to reflect the proper quantities of LSRs remaining in the package. <p>Note: All LSRs for a specific bulk package must be successfully received within four (4) hours from when the 1st LSR containing the NOR value was submitted. Otherwise, the LSRs will be returned to the CLEC with the following error message:</p> <p style="text-align: center;"><i>All Single LSRs in a Bulk Arrangement must be received within 4 hours of the first LSR received.</i></p>
NC	LY--
NCI	02QC3.OOD Loop Start (NOTE: LSC will apply appropriate NCI code in Attachment 1)
	02QC3.OOB Ground Start (NOTE: LSC will apply appropriate NCI code in Attachment 1)
SECNCI	02LS2 Loop Start
	02GS2 Ground Start
Cable ID/Chan Pair	<p>Cable ID – PXXX1 (must populate PXXX1 as shown here) Chan Pair – 00</p> <p>The same Cable ID and Chan pair will be used on every LSR. This will cause the bulk migration orders to fall out for manual handling at which time a AT&T Service Representative will turn the order into a UVL-SL2 commingling order.</p>
RMKS	<p>STS will provide a CFA for each circuit requested. The first CFA should be a complete CFA. Each CFA for each LNA thereafter should be complete unless there is not room and then STS should provide only what is different from the first CFA provided.</p> <p>EX: Remarks -</p> <p>The first CFA provided will be used for the first LNA and the second CFA will be used</p>



Bulk Migration Process

LSR Field	Requirement
	for the second LNA and so on.

7. Rate Elements

The following UNE rate elements are applicable for migrating UNE-P/WLP to UNE-L:

- UVL-SL2 Recurring and Non-recurring rates
- Electronic Service Order – SOMEK Non-recurring
- Central Office Channel Interface (COCI) Recurring and Non-recurring
- Charges associated with number porting
- Applicable UNE-P/WLP disconnect charges



Bulk Migration Process

8. UNE-P/WLP USOCs

The UNE-P/WLP Services that can be migrated to UVL-SL2 are represented by the Port USOCs listed in the table below:

Port USOC	Unbundled Port/Loop Combination Element	Description of Combinations using an Unbundled Exchange Port (UEP):
UEPBX	UEPLX	UEP, Business, 2 Wire Analog Business Line Port, UNE=P Basic Class of Service
UEPRX	UEPLX	UEP, Residence, 2 Wire Analog Residence Line Port, UNE-P/WLP Basic Class of Service
UEPCO	UEPLX	UEP, Coin Basic Class of Service UNE-P/WLP

9. UNE-L USOCs

Below are the UVL-SL2 types and associated USOCs to which the STS UNE-P/WLPs can be migrated:

Loop USOC	Description
UEAL2	2 Wire Unbundled Voice Loop – SL2 with Loop or Ground Start Signaling
UEAR2	2 Wire Unbundled Voice Loop – SL2 with Reverse Battery Signaling

10. Bulk Request Service Order Intervals

STS must submit the LSRs in Bulk Arrangement and the LSRs must be accepted by the mechanized system at least eight (8) business days in advance of the earliest scheduled due date.



Bulk Migration Process

11. Acronyms

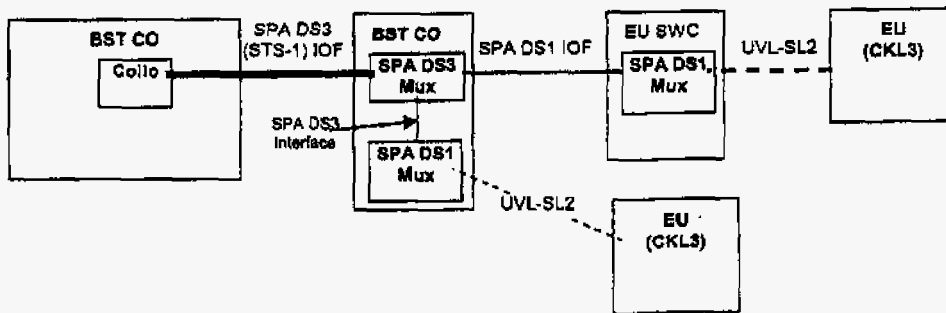
AECN	Alternate Exchange Carrier Number
BSLA	Bulk Single LSR Arrangement
BOPI	Bulk Order Package Identifier
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CSPC	Customer Service Provisioning Center
DDD	Desired Due Date
EATN	Existing Account Telephone Number
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
ICA	Interconnection Agreement
LSC	Local Service Center
LNP	Local Number Portability
LSR	Local Service Request
MDF	Main Distribution Frame
NOR	Number of Orders
OC	Order Coordination
OSS	Operation Support System
PF	Pending Facility
PON	Purchase Order Number
PRJID	Project Identification
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SUP	Supplemental
SV	Subscription Version
SWC	Serving Wire Center
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	UNE Loop
UVL-SL2	Unbundled Voice Loop – Service Level 2
WLP	Wholesale Local Platform
WSM	Wholesale Support Manager



Bulk Migration Process

Attachment 1 – STS's Commingled UVL-SL2 Example

UVL-SL2 Loop on SPA DS1 IOF connecting to SPA DS3 (STS-1) IOF



Service Level	NC Code	NCI Code (CKL1)	SECNCI Code (CKL3)	CLEC Interface
UNE 2-wire UVL-SL2	LY--	04QB6.S1	02LS2 (LPS) 02GS2 (GST)	DS1 Mux

AT&T Responses to STS Matrix Questions from FPSC

Line #	Per STS: BR/User Guide/LSOR/LOH	Per STS: Product	AT&T Corrective Action	AT&T Response
10	LOH Section 3 Ordering LNP BSLA Analog Designed Loop	UNE SL2 Commingle REQTYP B, ACT V, LNA V	4/27/10: Issued CLECSE10-039 (ORDERING AND PROVISIONING) LSOR Clarification (Condition Notes) and Documentation Defect (YPH Field)	<p>LEX populates the SPEC, NC, and NCI codes based upon a selection of Loop Type. If a Loop Type of "Other" is selected, this presents the SPEC, NC, NCI and SECNCI as blank, allowing the user to enter any value into each of these fields applicable for the product being ordered.</p> <p>LEX REQTYP B ACT V LSR Commingle Bulk Migration and REQTYP B ACT V Migration of EU to Commingle UVL-SL2 Loop with Number Portability were successfully demonstrated on January 22, 2010; other product arrangements were not requested.</p> <p>"Conditional" Notes have been modified in the 9-State LSOR VOL II, 4/27/10:</p> <ul style="list-style-type: none"> • Section 3.1, Field Representations Definitions • Subsection 4, Matrix Table, for value of Condition (c) • Subsection 7, Condition Note(s) • Subsection Figure 3-3, Example 2



Alan C. Gold

From: Alan C. Gold [agold@acgoldlaw.com]

Sent: Friday, May 14, 2010 11:46 AM

To: 'EDENFIELD JR., KIP (Legal)'

Dear Kip

This confirms our conversation in which I advised you that STS will not protest the FPSC order allowing the retirement of LENS provided you either advise me in a writing which is not confidential, that there are no limitations on ordering commingled circuits in LEX other than what is applicable to non-commingled arrangements of a similar nature, or if there are limitations, exactly what the limitations are.

Alan

5/21/2010



Alan C. Gold

From: Alan C. Gold [agold@acgoldlaw.com]

Sent: Friday, May 14, 2010 1:09 PM

To: 'EDENFIELD JR., KIP (Legal)'

Cc: 'Keith Kramer'

Hi Kip

I thought one point in my recent e-mail should be clarified in order that there is no misunderstanding and you are not put in an awkward position in our case before the FCC. In the FCC case, AT&T maintains that STS has limited itself regarding commingling pursuant to the Confidential Settlement Discussion. Although we disagree with AT&T's position, we are not asking you or the FPSC to interpret the Confidential Settlement Agreement. The only limitations that we are presently talking about are those limitations applicable to all CLECs who have appropriate language in their ICAs and wholesale agreements which allow them to do commingling including without limitation, Voice Grade Loops with special access transport. Therefore your answer to the limitations should disregard the Confidential Settlement Agreement. Also at the FCC, there is a dispute whether SL1s can be utilized in commingled arrangements. We are not asking your comments on this issue either

5/21/2010



Alan C. Gold

From: EDENFIELD JR., KIP (Legal) [ke2722@att.com]
Sent: Friday, May 14, 2010 2:04 PM
To: Alan C. Gold
Subject: Resolution of LEX Order
Alan-

Based on the representations in your two e-mails to me today and in exchange for STS foregoing any protest of Florida Commission Order PSC-10-0253-PAA-TP issued on April 26, 2010 in Docket 090430-TP, AT&T advises as follows: Based on AT&T's most recent processes, there are no specific provisioning limitations for designed commingled circuits other than those generally applicable for EELs and other designed circuits. For bulk migrations, the limitations are found in the Bulk Migration (Single LSR/Bulk Arrangement) CLEC Information Package, Section 6 'Bulk Migration Options' and Section 8 'Bulk Migration Scheduling Tool' for limitations per day. For Single (Individual) LSR submissions, the limitations would be the same as described in the SE Interval Guide for SL2 Commingled Loops or EELs.

Kip

5/18/2010

