

**Business Markets** 675 West Peachtree Street Atlanta, Georgia 30375

## Carrier Notification SN91086053

Date: March 22, 2006

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

Subject: Facility-Based CLECs (Interconnection/Contractual and Product/Service) – BellSouthinitiated 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
- 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