
BellSouth Business Markets

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Atlanta, Georgia 30375

**Carrier Notification
SN91086126**

Date: June 15, 2006

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

Subject: Facility-based CLECs - (Interconnection/Contractual and Product/Service) – BellSouth-initiated Conversion of de-listed High Capacity Loops and Transport Circuits to Alternative Arrangements, Unbundled Network Element-Platform Service to Resale, and the Impact on Certain Services and Features in the State of Alabama

On March 20, 2006, the Alabama Public Service Commission (APSC) issued its Final Order Resolving Disputed Issues (Order), in Docket Number 29543. Pursuant to the Order, 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 APSC's ordered contract provisions into such Interconnection Agreements with BellSouth. Although several CLECs have returned their signed amendments to BellSouth, some CLECs have still not done so.

The APSC's Order states: "The Commission concludes that existing interconnection agreements must be amended to reflect the TRO and TRRO mandated changes to BellSouth's obligation to provide unbundled network elements pursuant to § 251(c)(3)."¹ The Order further states: "All interconnection agreement amendments necessitated by the Commission's findings and conclusions herein shall be submitted to the Commission within 30 days of the effective date of this Order. If an amendment is not executed and submitted within the allotted timeframe, the language approved herein by the Commission will go into effect regardless of whether an amendment is signed."² Pursuant to the APSC's Order, the aforementioned Change of Law amendments were required to be filed with the Commission on May 19, 2006.

Therefore, this is to advise all CLECs operating in Alabama who still have an embedded base of Unbundled Network Element-Platform (UNE-P) lines in place that, if you have not submitted orders to disconnect such lines or convert such lines to alternative services that, regardless of whether you have signed the above-referenced Change of Law amendment, pursuant to the APSC's Order, BellSouth will begin converting the remaining UNE-P lines to Resale (absent an agreement otherwise), and such conversions will begin as early as June 26, 2006. Once the lines are converted from UNE-P to Resale, BellSouth will prepare a true-up bill that identifies, back to March 11, 2006, the difference between the UNE-P rates and the Resale rates, and send such bill to the CLEC. Please be advised that if a CLEC does not have a Resale Q account for Alabama, and BellSouth is unable to establish one, then that CLEC's UNE-P service will be disconnected rather than being converted to Resale.

¹ Order at p. 16

² Order at p. 34

In the event that BellSouth initiates conversions because the CLEC fails to do so, please be advised of the following:

- 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 (RCF) 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, RCF 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, RCF services purchased pursuant to the Interconnection Agreement will be disconnected.
- Because there is no Resale equivalent for Digital Direct Integration Termination Service (DDITS) DS1 service or DDITS trunk arrangements, any such UNE-P services 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 Market Based Rate (MBR) Agreement is still available.
- 2) CLECs may convert their UNE-P arrangements to UNE Loops (UNE-L) using BellSouth’s Bulk Migration process.

With respect to high capacity loops and transport, the APSC’s order states:

“At this late juncture, CLECs should have already submitted conversion orders for local circuit switching and high capacity loops and transport as the transition period for such elements has expired. ...For CLECs that failed to identify their embedded base by March 10, 2006 (for ... high capacity loops and transport) ...BellSouth will be permitted to identify and convert such arrangements itself and assess CLECs the “switch as is” charge discussed below. BellSouth will further be allowed to assess such CLECs the applicable recurring resale or wholesale tariffed rate for the affected services beginning with the aforementioned conversions. Pursuant to the TRRO however, the “transitional rates” discussed below are (or were) applicable through March 10, 2006 (for ... high capacity loops and transport)... ”³

Pursuant to language cited above, BellSouth is compiling a list of high capacity loops and transport in unimpaired wire centers for conversion to tariffed services. Once the list is complete, CLECs will be notified as to when BellSouth will commence such conversions. Clearly, it would be advantageous to

³ Order at p. 13

all if CLECs were to submit orders for such conversions. Therefore, rather than BellSouth initiating such conversions, BellSouth urges affected CLECs to submit conversion orders as quickly as possible.

If you have any questions regarding BellSouth's plans to begin initiating the UNE-P to Resale conversions as of June 26, 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
BellSouth Business Markets