
BellSouth Business Markets

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91086253**

Date: October 27, 2006

To: Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Interconnection/Contractual) – Interconnection Agreements in Mississippi that are Not Compliant with the Federal Communication Commission’s Triennial Review Order and Triennial Review Remand Order

On October 20, 2006, the Mississippi Public Service Commission (“MPSC”) issued its Order in the Generic Change of Law proceeding in Docket No. 2005-AD-139 (“Order”). Such Order obligates CLECs operating in the state of Mississippi to amend Interconnection Agreements that are not compliant with the Federal Communication Commission’s (“FCC”) Triennial Review Order (“TRO”) and Triennial Review Remand Order (“TRRO”) so as to bring them in compliance with those orders.

Pursuant to the Order, BellSouth herewith notifies all Mississippi CLECs that are operating under a non-TRO/TRRO compliant Interconnection Agreement with BellSouth that, by Friday, November 3, 2006, BellSouth will send Change of Law amendments to incorporate the TRO/TRRO provisions into the Interconnection Agreement between your company and BellSouth. In turn, all affected CLECs must return executed amendments no later than Tuesday, November 28, 2006, so as to allow BellSouth to complete the necessary processes to file these amendments by December 4, 2006. It is critical that BellSouth and all impacted CLECs operating in Mississippi execute and file their Change of Law amendments within this timeframe as the MPSC Order obligates the parties to file such amendments within forty-five (45) days of its Order, or December 4, 2006.

Many of the joint issues in this proceeding arise out of the TRRO and are subject to the FCC’s transition period, which ended on March 10, 2006, for all Unbundled Network Element-Platform (“UNE-P”) arrangements and for all high capacity loops and transport in unimpaired wire centers. The Order specifically states that “The Commission finds that all interconnection agreements impacted by this Order shall be effective as of March 10, 2006, and CLECs will have fourteen (14) days from the date of this Order in which to appropriately convert any remaining former UNEs with BellSouth. If CLECs fail to do so, BellSouth shall be authorized to make the conversions subject to applicable nonrecurring charges [and]...the rates applicable to alternative arrangements [will be]...retroactive to March 11, 2006.”¹ As a result, affected CLECs should submit conversion requests for such former UNEs by Friday, November 3, 2006. Once the UNE is converted to the applicable tariff or resale service, BellSouth will issue a bill for the difference between UNE rates charged after March 11, 2006, and the resale or tariffed rate for each of these elements for the applicable period of time, as allowed by the Order.

With this Carrier Notification Letter, BellSouth posts the wire center list for the State of Mississippi as set forth in the Order. The wire centers on this list are those that the MPSC deemed unimpaired.

¹ Order, page 28

Pursuant to the Order, the rate for the tariffed equivalent service for all impacted DS1 and DS3 UNEs in these wire centers will apply as specified in BellSouth's proposed amendment.

To the extent that any affected CLEC wishes to negotiate language to implement Issue No. 31, "What language should be used to incorporate the FCC's ISP Remand Core Forbearance Order into interconnection agreements," please contact your BellSouth negotiator as soon as possible to initiate such negotiations.

If you have questions regarding this notification, please contact your BellSouth contract negotiator.

Sincerely,

ORIGINAL SIGNED BY JIM TAMPLIN FOR KRISTEN E. SHORE

Kristen E. Shore – Director
BellSouth Business Markets

Attachment

Mississippi Unimpaired Wire Center List
 (pursuant to the Mississippi Public Service Commission's October 20, 2006 Order in Docket 2005-AD-139)

State	Wire Center	Total Business Lines	Number of FB Collocators if 3 or Greater	Interoffice Transport		High Capacity Loops	
				Tier 1	Tier 2	No Impairment for DS3	No Impairment for DS1
MS	JCSNMSCP	40,109	3	X			
MS	HTBGMSMA	12,829	3		X		