
BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification**SN91083665**

Date: November 6, 2003

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECs – (Billing) **REVISED:** Reconciliation and Retroactive Billing of Unbundled Network Element – Platform (UNE-P) Market Rates (Originally posted on April 9, 2003, and Revised on May 23, 2003)

As described in Carrier Notification SN91083301, posted to the BellSouth Interconnection Services' Web site on August 30, 2002, BellSouth began reconciling and applying retroactive billing of UNE-P Market Rates, where applicable, in October 2002. This first phase of reconciliation applied to recurring charges for UNE-P lines within the Federal Communications Commission (FCC) Unbundled Local Switching Exemption billed in April 2002 through June 2002 for Louisiana, and October 2001 through December 2001 for Florida.

Further reconciliation billing did not occur until January 2003. During this second phase, BellSouth reconciled and billed UNE-P Market Rates again for the same criteria and states but for the timeframes of July - August 2002 for Louisiana, and January – February 2002 for Florida.

The third phase of UNE-P Market Rate billing occurred in March 2003, and again applied to the same criteria but for the timeframes of September – October, 2002 for Louisiana and March – April, 2002 for Florida.

The most recent and fourth phase of reconciliation and billing of UNE-P Market Rate occurred in May 2003. This phase included recurring and nonrecurring charges for UNE-P lines within the FCC Unbundled Local Switching Exemption and applied to Florida, Georgia, Louisiana, North Carolina and Tennessee. BellSouth adhered to each CLEC's Interconnection Agreement and the state statute of limitations in the application of these charges. Billing applied to the following timeframes unless otherwise limited by the Interconnection Agreement.

Florida:	May 2002 – January 2003
Georgia:	February 2000 – January 2003
Louisiana:	November 2002 – January 2003
North Carolina:	February 2000 – January 2003
Tennessee	February 2000 – January 2003

Due to the timing of entering the charges into the billing system, some charges were actually applied in the April 2003 bill period. The reconciled charges were entered into BellSouth's billing system on April 26, 2003 to be effective immediately. Therefore, CLECs with bill periods on the 26th and greater may have received their reconciled charges on their April 2003 bill for the impacted Q Accounts rather than the May bill. Not all CLECs with a bill period of the 26th and greater received the reconciled billing in the April bill period as the processing times varied for each state. BellSouth apologizes for any inconvenience this may have caused.

A prospective mechanized billing application of UNE-P Market Rates is still under development and an implementation date has not been determined. BellSouth will reconcile under-billed UNE-P Market Rates and will bill every six months from this point forward (every **June** and **December** of each year) until such mechanized solution can be developed. **Therefore, the scheduled November 2003 billing will occur in December 2003, and the next scheduled reconciliation and billing will occur in June 2004.**

The charges will be listed in the Other Charges and Credits (OC&C) portion of your company's BellSouth bill. Further, BellSouth will provide the underlying data supporting BellSouth's reconciliation of the charges for each affected telephone number on compact disc to the billing contact name provided by your BellSouth Local Contract Manager.

If you have questions regarding the Interconnection Agreement, please contact your Local Contract Manager. If you have questions regarding billing, please contact BellSouth's Billing and Collections department.

Sincerely,

ORIGINAL SIGNED BY JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services