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**BellSouth Interconnection Services**

675 West Peachtree Street  
Atlanta, Georgia 30375

**Carrier Notification  
SN91085088**

Date: August 11, 2005

To: Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Product/Service) – **REVISED** - Triennial Review Remand Order (TRRO) – Unbundling Rules - Wire Centers that Satisfy Non-impairment Thresholds (Originally posted on April 15, 2005)

As explained in BellSouth's Carrier Notification letter **SN91085073**, posted March 24, 2005, because BellSouth identified an error in the mathematical formula that was used to count retail digital access lines on a per 64 kbps-equivalent basis, BellSouth retained an independent third-party, Deloitte and Touche USA LLP (Deloitte), to review the application of the methodology BellSouth used to count business lines. The following definition of business lines is taken from Section 51.1 of the Federal Communication Commission's (FCC) Triennial Review Remand Order's (TRRO) Appendix B:

Business Line: A business line is an incumbent LEC-owned switched access line used to serve a business customer, whether by the incumbent LEC itself or by a competitive LEC that leases the line from the incumbent LEC. The number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, plus the sum of all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements. Among these requirements, business line tallies (1) shall include only those access lines connecting end-user customers with incumbent LEC end-offices for switched services, (2) shall not include non-switched special access lines, (3) shall account for ISDN and other digital access lines by counting each 64 kbps-equivalent as one line. For example, a DS1 line corresponds to 24 64 kbps-equivalents, and therefore to 24 "business lines."

Deloitte reviewed the application of the methodology that BellSouth used to identify all business lines as defined by the FCC, including the methodology used to account for digital access lines on a per 64 kbps-equivalent basis. In addition, BellSouth conducted site visits to its central offices to review its counts of CLEC-provided, powered-up, fiber-based collocators in order to confirm the presence of the requisite number of fiber-based collocators needed to meet the FCC's various thresholds. In accordance with the information reviewed by Deloitte and obtained through BellSouth's central office site visits, attached is BellSouth's corrected list of wire centers where the FCC's non-impairment thresholds, as set forth in the TRRO, have been met and, thus, where high capacity loops, transport and dark fiber ("high capacity elements") are no longer required to be unbundled pursuant to Section 251 of the Telecommunications Act of 1996 (Act). Upon request, BellSouth will make available to CLECs for review Deloitte's report and supporting data, together with data compiled by BellSouth in determining the presence of fiber-based collocators subject to the protective agreement established in the TRRO proceeding and any limitations imposed by Section 222 of the Act.

Unless otherwise ordered by a particular state public service commission, effective April 17, 2005, should a CLEC place an order for a high capacity element as an Unbundled Network Element (UNE) in a wire center where that high capacity element is not available on an unbundled basis, as identified on BellSouth's wire center list, BellSouth will accept such order as self-certification from that CLEC and its

officers that the CLEC: (i) has undertaken a reasonably diligent inquiry as to whether the element in question is available on an unbundled basis in such wire center, and (ii) has determined that its request is consistent with the FCC's requirements for obtaining unbundled access to such high capacity element. Thus, BellSouth will accept and process such order for the subject high capacity element on an unbundled basis in that wire center, and will thereafter, where appropriate, pursue a claim against the CLEC ordering such element in that wire center, in accordance with the dispute resolution provisions of the interconnection agreement.

BellSouth expects that any CLEC that self-certifies availability of high capacity elements as UNEs by placing orders for those elements will do so in good faith in accordance with the requirements of the TRRO.

Please contact your BellSouth contract negotiator with any questions.

Sincerely,

**ORIGINAL SIGNED BY KRISTEN ROWE**

Kristen Rowe - Director  
BellSouth Interconnection Services

Attachment

Superseded by CNL SN91086133

NOTE: N/A in Column D means that BellSouth is not relying on the existence of powered-up FBCs to meet the FCC's threshold impairment test.

Classification Using D&T Line Counts and FB Collo On-site Review Results							
				Interoffice Transport		High Capacity Loops	
State	Wire Center	Deloitte's Calculated Total Business Lines	# of Fiber-Based Collos after On-site Reviews	Tier 1	Tier 2	No Impairment for DS3	No Impairment for DS1
GA	ATLNGACS	98,029	10	X		X	X
NC	CHRLNCCA	86,443	9	X		X	X
FL	MIAMFLPL	85,624	5	X		X	X
GA	MRTTGAMA	85,438	4	X		X	X
TN	NSVLTNMT	79,095	4	X		X	X
GA	NRCRGAMA	77,035	9	X		X	X
NC	RLGHNCMO	75,613	7	X		X	X
LA	NWORLAMA	73,613	6	X		X	X
GA	ATLNGAPP	72,392	7	X		X	X
GA	ALPRGAMA	71,291	7	X		X	X
FL	MIAMFLGR	66,928	11	X		X	X
GA	ATLNGABU	57,200	7	X		X	
FL	ORLDFLMA	56,714	11	X		X	
KY	LSVLKYAP	56,259	4	X		X	
FL	FTLDFLMR	55,898	8	X		X	
FL	GSVFLMA	55,785	5	X		X	
GA	SMYRGAPF	49,017	8	X		X	
GA	DNWDGAMA	48,741	7	X		X	
SC	CLMASCSN	47,593	5	X		X	
NC	GNBONCEU	47,399	6	X		X	
SC	GNVLSCDT	45,581	6	X		X	
FL	JCVLFLCL	44,283	6	X		X	
LA	LFYTLAMA	43,394	N/A	X			
FL	ORLDFLPC	42,881	7	X		X	
FL	MIAMFLHL	41,600	7	X		X	
NC	CPHLNCRO	41,265	4	X		X	
FL	MIAMELAE	41,135	5	X		X	
FL	BCRTFLMA	39,196	5	X		X	
GA	BSVWGAMA	38,964	3	X			
LA	BTRGLAMA	38,652	4	X		X	
LA	BTRGLAGW	38,405	N/A	X			
MS	JCSNMSCP	38,331	3	X			
AL	BRHMALMT	37,617	N/A		X		
LA	MONRLAMA	37,032	N/A		X		
TN	MMPHTNOA	36,434	3		X		
TN	KNVLTNMA	36,405	4	X			
GA	CLMBGAMT	36,029	N/A		X		
FL	HLWDFLPE	35,950	4	X			
NC	WNSLNCFI	35,769	3		X		
GA	DLTHGAHS	35,743	N/A		X		
FL	HLWDFLWH	34,778	N/A		X		

04-14-05

Revised 8/11/05 to correct  
FBC Counts for DNWDGAMA,  
SMYRGAMA AND CHRLNCUN

NOTE: N/A in Column D means that BellSouth is not relying on the existence of powered-up FBCs to meet the FCC's threshold impairment test.

Classification Using D&T Line Counts and FB Collo On-site Review Results							
				Interoffice Transport		High Capacity Loops	
State	Wire Center	Deloitte's Calculated Total Business Lines	# of Fiber-Based Collos after On-site Reviews	Tier 1	Tier 2	No Impairment for DS3	No Impairment for DS1
FL	PRRNFLMA	34,328	3		X		
FL	WPBHFLHH	33,886	4	X			
FL	MLBRFLMA	33,701	4	X			
NC	GNBONCAS	33,689	6	X			
GA	ATLNGAEP	33,586	4	X			
FL	PMBHFLMA	32,853	4	X			
GA	ATLNGASS	32,835	4	X			
FL	WPBHFLAN	32,491	5	X			
TN	MMPHTNBA	32,252	N/A		X		
GA	ATLNGATH	31,824	4	X			
FL	DYBHFLMA	31,718	7	X			
LA	NWORLAMT	31,530	N/A		X		
LA	SHPTLAMA	31,012	4	X			
SC	GNVLSCWR	30,818	N/A		X		
GA	CHMBGAMA	30,788	N/A		X		
FL	ORLDFLPH	30,592	6	X			
FL	FTLDLCY	30,448	4	X			
FL	FTLDFLJA	29,883	5	X			
AL	MTGMALDA	29,864	N/A		X		
GA	LRVLGAOS	29,793	N/A		X		
GA	ALBYGAMA	29,688	N/A		X		
FL	PNSCFLFP	29,682	N/A		X		
FL	FTLDFLPL	29,632	5	X			
GA	ATHNGAMA	29,500	N/A		X		
FL	PNSCFLBL	29,236	4	X			
AL	MTGMALMT	28,381	N/A		X		
GA	SMYRGAMA	28,298	5	X			
NC	RLGHNCCHO	28,172	8	X			
TN	MMPHTNEL	28,055	4	X			
GA	NIKRGAMA	27,918	N/A		X		
FL	ORLDFLAP	27,898	5	X			
FL	STRTFDMA	27,167	N/A		X		
GA	SVNHGABS	26,960	4	X			
NC	CARYNCCE	25,980	4	X			
GA	LLBNGAMA	25,919	N/A		X		
TN	NSVLTNBW	25,876	N/A		X		
FL	BCRTFLBT	25,822	N/A		X		
SC	CHTNSCDT	25,757	5	X			
AL	HNVALMT	25,715	N/A		X		
NC	RLGHNCGL	25,459	4	X			
FL	PMBHFLFE	25,321	5	X			

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				Interoffice Transport		High Capacity Loops	
State	Wire Center	Deloitte's Calculated Total Business Lines	# of Fiber-Based Collos after On-site Reviews	Tier 1	Tier 2	No Impairment for DS3	No Impairment for DS1
TN	CHTGTNNS	24,896	3		X		
TN	MMPHTNGT	24,814	N/A		X		
FL	MIAMFLRR	24,699	4	X			
TN	NSVLTNST	24,693	N/A		X		
FL	WPBHFLGR	24,534	4	X			
NC	CHRLNCBO	24,451	8	X			
GA	MACNGAMT	24,338	N/A		X		
FL	ORLDFLSA	24,120	9	X			
FL	WPBHFLGA	24,048	N/A		X		
FL	MIAMFLWM	23,775	5	X			
FL	MIAMFLSO	23,358	4	X			
FL	DRBHFLMA	23,300	3		X		
GA	AGSTGAMT	23,218	3		X		
TN	MMPHTNMA	23,144	7	X			
FL	MIAMFLPB	23,024	4	X			
TN	NSVLTNDO	22,928	N/A				
TN	CHTGTNBR	22,838	N/A				
FL	FTLDFLOA	22,809	5	X			
SC	SPBGSCMA	22,707	3		X		
FL	MIAMFLCA	22,635	3		X		
NC	WLMGNCFO	22,397	4	X			
FL	ORLDFLCL	22,092	6	X			
FL	JCVLFLSJ	22,020	4	X			
TN	MMPHTNSL	21,494	3		X		
FL	FTLDFLCR	20,833	N/A				
FL	JCVLFLBW	20,647	N/A				
FL	HLWDFLMA	20,569	N/A				
TN	MRBQTNMA	20,537	N/A				
FL	WPBHFLRB	20,420	3		X		
FL	SNPFLMA	20,074	4	X			
TN	NSVLTNUN	19,857	3		X		
AL	BRHMALRC	19,523	N/A				
AL	MOBLALAZ	19,159	5	X			
FL	MNDRFLLO	18,494	4	X			
FL	VRBHFLMA	18,280	N/A				
TN	NSVLTNCH	18,017	N/A				
FL	COCOFDMA	17,826	4	X			
NC	GSTANCSO	17,752	N/A				
FL	NDADFLGG	17,055	5	X			
FL	BYBHFLMA	16,904	3		X		
FL	JCVLFLSM	16,888	5	X			

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				Interoffice Transport		High Capacity Loops	
State	Wire Center	Deloitte's Calculated Total Business Lines	# of Fiber-Based Collos after On-site Reviews	Tier 1	Tier 2	No Impairment for DS3	No Impairment for DS1
KY	LSVLKYBR	16,653	3		X		
NC	BURLNCDA	16,474	3		X		
FL	DLBHFLMA	16,166	3		X		
NC	CHRLNCDE	16,071	3		X		
LA	BTRGLASB	15,280	3		X		
NC	CHRLNCUN	14,755	4	X			
FL	NDADFLOL	14,443	N/A				
TN	FKLNTNMA	14,002	N/A				
SC	CLMASCSA	13,716	3		X		
FL	STAGFLMA	13,653	N/A				
TN	MMPHTNCT	13,449	N/A				
TN	CHTGTNDT	13,331	N/A				
NC	CHRLNCSH	13,061	5	X			
FL	JCVLFLAR	12,824	3		X		
FL	WPBHFLLE	12,790	3		X		
NC	SLBRNCMA	11,981	3		X		
FL	MIAMFLBA	11,974	3		X		
MS	HTBGMSMA	11,700	3		X		
NC	CHRLNCRE	11,475	6	X			
TN	MMPHTNMT	10,805	3		X		
NC	CHRLNCLP	9,872	4	X			
FL	MNDRFLAV	4,976	N/A				

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