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August 24, 2005

Ms. Mary Rose Sirianni  
Manager, Regulatory  
BellSouth Telecommunications, Inc.  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

RE: May and June 2005 SEEM Adjustments, Docket No. 000121A

Dear Ms. Sirianni:

It is my understanding that BellSouth has recently implemented several changes resulting in a net decrease in SEEM payments to CLECs and to the state of Florida in the last several months. Staff is trying to understand, to account for, and to reconcile the specific adjustments that BellSouth is making to its PARIS reports. Below is a list of information needed to assist staff in this endeavor.

First, BellSouth has indicated that the implementation of Market Based Rate Agreements for UNE-P signed by CLECs has resulted in significant reductions in Tier 1 payments. In order to understand the net effect of Market Based Rate Agreements, please provide:

1. UNE-P Tier 1 and 2 SEEM payment history by submeasure for December 2004 to present.

CMP \_\_\_\_\_

2. Monthly number of UNE-P lines covered by Market Based Rate Agreements for December 2004 to present.

COM \_\_\_\_\_

CTR \_\_\_\_\_

3. All Market Based Rate Agreements that have provisions affecting SEEM payments.

ECR \_\_\_\_\_

Second, BellSouth has indicated the adjustments result from the implementation of findings of the recently completed SQM/SEEM audit in Florida.

GCL \_\_\_\_\_

OPC \_\_\_\_\_

4. Please specify the month in which each of the audit findings were implemented and the resulting adjustments for each month affected.

RCA \_\_\_\_\_

SCR \_\_\_\_\_

5. Please make available for staff review the S-Plus code for remedy payment calculations for all measures affected by the audit (AOCCNI, CNI, OCI, MAD, CTRR, OOS, PMIA, PMIAIS, PMRA, PPT and PRT).

SGA \_\_\_\_\_

SEC   1  

OTH \_\_\_\_\_

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6. Please provide an Excel file containing June 2005 cell-level data for at least 2 submeasures within each affected measure (for a random masked CLEC ). If possible, one submeasure should contain multiple cells with multiple data and the other submeasure should contain one cell with multiple data and the remaining cells with no data.

Third, BellSouth has indicated to staff that an error occurred and that no Percent Provisioning Troubles in X Days payments were made in May.

7. Please perform a root cause analysis and report the cause of the problem, the dollar impact to SEEM, and the resolution of the issue.

Last, staff continues to be concerned by BellSouth's lack of explanation of causes for adjustments and the resulting affect on remedy payments.

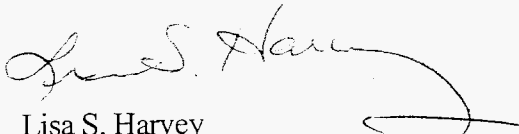
8. BellSouth June 2005 Florida PARIS Tier 1 Transmitted Payment Report contains 17 adjustments for previous months with no explanation. Please provide a detailed explanation for each of the adjustments shown on the PARIS report.
9. BellSouth's June 2005 Florida PARIS Tier 1 Transmitted Payment Report shows total remedies in the amount of \$719,391.31. In comparison, the Florida SEEM Report, produced by Ms. Bernadette Gorman and provided to the Commission, shows total remedies in the amount of \$48,900 for June 2005. Please reconcile the two amounts.
10. BellSouth's June 2005 PARIS Tier 1 Transmitted Payment Report posted to the PMAP website shows an amount of \$3,581,806.40 for total remedies from prior months in waiting status. Please identify, with specificity, how this adjustment was derived, including the months affected, the applied adjustment each month, the specific submeasures affected and adjusted each month, and the specific CLECs for which an adjustment was applied each month.
11. Please provide, by CLEC, monthly Tier 1 Florida SEEM transmitted payments and any applicable adjustments from November 2005 to present.
12. Please identify any other known issues which will or may affect Florida SEEM payment or adjustments in the coming six months.

Staff notes that BellSouth has recently requested to be relieved of the requirement for a re-audit of specific findings affecting SEEM because of low dollar impact. Staff will consider this request upon receipt and evaluation of required affidavits attesting to audit implementation and receipt of the information described above. Please provide the information requested above by **September 8, 2005**.

Ms. Mary Rose Sirianni  
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If you have any questions, please feel free to call me.

Sincerely,

  
Lisa S. Harvey  
Chief, Bureau of Regulatory Review

LSH\bjm

cc: Beth Salak  
Dale Mailhot  
Sally Simmons  
Rick Moses  
Jerry Hallenstein  
David Rich  
Kit Kennedy  
Adam Teitzman  
Kira Scott