ORIGINAL

Matilda Sanders

-			_
-	r۸	m	•

Barclay, Lynn [Lynn.Barclay@BellSouth.com]

Sent:

Tuesday, December 12, 2006 3:19 PM

To:

Filings@psc.state.fl.us

Cc:

Woods, Vickie; Randa, Johna A; Nancy Sims; Holland, Robyn P; Bixler, Micheale; Slaughter, Brenda;

Culpepper, Robert

Subject:

000121A-TP BellSouth's Responses to Action Items

Attachments: 000121A-TP BellSouth's Response to Action Item.pdf

A. Lynn Barclay

BellSouth Telecommunications, Inc.

c/o Nancy Sims

150 South Monroe, Rm. 400

Tallahassee, FL 32301-1558

404 335-0788

lynn.barclay@bellsouth.com

B.	Docket No.	000121A-TP:	In Re:	Investigation into	the Establishment of	Operations	Support Systems	Permanent In	icumbent
Local	Exchange 1	Telecommunica	ations C	Companies.					

C.	BellSouth Telecommunications, Inc.	CMP
		СОМ
D.	9 pages total (includes Bayó letter certificate and response)	CTR
E.		ECR
	ference call.	GCL
	<<000121A-TP BellSouth's Response to Action Item.pdf>>	OPC
		RCA
Ly	mn Barclay	SCR
_		SGA
	West Peachtree Street te 4300	SEC
Atla	nta, GA 30375	нтс
404	335-0788	

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. GA623

DOCUMENT NUMBER-DATE

11353 DEC 128

Robert A. Culpepper Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0841



December 12, 2006

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121A-TP

In Re: Investigation into the establishment of operations support systems permanent incumbent local exchange Telecommunications companies

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Responses to action items arising out of the December 6, 2006 plan review conference call. A copy of the same is being provided to all parties of record.

Sincerely

Robert A. Culpeppe

Enclosures

cc: All parties of record Jerry D. Hendrix James Meza, III

661082

CERTIFICATE OF SERVICE Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 12th day of December, 2006 to the following:

Adam Teitzman Jerry Hallenstein Lisa Harvey David Rich Staff Counsel Florida Public Service Commission **Division of Legal Services** 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Tel. No. (850) 413-6175 Fax. No. (850) 413-6250 ateitzma@psc.state.fl.us ihallens@psc.state.fl.us lsharvev@psc.state.fl.us drich@psc.state.fl.us

Tracy W. Hatch
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel No. (850) 425-6360
Fax No. (850) 425-6361
thatch@att.com

Sonia Daniels
AT&T
1230 Peachtree Street
Suite 400
Atlanta, GA 30309
Tel. No. (404) 810-8488
Fax. No. (281) 664-9791
soniadaniels@att.com

Verizon, Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Tel. No. (813) 483-2617
Fax. No. (813) 223-4888
kimberly.caswell@verizon.com

Peter M. Dunbar, Esquire
Karen M. Camechis, Esquire
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box 10095 (32302)
215 South Monroe Street, 2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
pete@penningtonlawfirm.com

Supra Telecommunications and Information Systems, Inc.
Marva Johnson
2901 S.W. 149th Avenue
Suite 300
Miramar, FL 33027-4153
Phone: (786) 455-4248
FAX: (786) 455-4600
marva.johnson@supratelecom.com

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Douglas C. Nelson Sprint Nextel 233 Peachtree Street, NE Suite 2200 Atlanta, GA 30303 Tel. No. 404 649-0003 Fax No. 404 649-0009 douglas.c.nelson@sprint.com

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5493
Fax. No. (770) 284-5488
brian.sulmonetti@wcom.com

William Weber, Senior Counsel Gene Watkins (+)
Covad Communications
1230 Peachtree Street, N.E.
19th Floor, Promenade II
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (508) 300-7749
wweber@covad.com
jbell@covad.com
gwatkins@covad.com

John Rubino
George S. Ford
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, Florida 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond
& Sheehan, PA
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@moylelaw.com
Represents KMC Telecom
Represents Covad
Represents Mpower

Jonathan E. Canis
Kelley Drye & Warren, LLP
1200 19th Street, N.W., Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jcanis@kelleydrye.com

Tad J. (T.J.) Sauder Manager, ILEC Performance Data Birch Telecom of the South, Inc. 2300 Main Street FL Kansas City, MO 64108 Tel. No. (816) 300-3202 Fax. No. (816) 300-3350

John D. McLaughlin, Jr. KMC Telecom 1755 North Brown Road Lawrence, Georgia 30043 Tel. No. (678) 985-6262 Fax. No. (678) 985-6213 imclau@kmctelecom.com

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335-8349
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474
aisar@millerisar.com

Renee Terry, Esq. e.spire Communications, Inc. 14405 Laurel Pl. Suite 200 Laurel, MD 20707-6102 Tel. No. (301) 361-4298 Fax. No. (301) 361-4277

Mr. David Woodsmall
Mpower Communications, Corp.
175 Sully's Trail
Suite 300
Pittsford, NY 14534-4558
Tel. No. (585) 218-8796
Fax. No. (585) 218-0635
dwoodsmall@mpower.com

Dulaney O'Roark III (+)
WorldCom, Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5498
De.ORoark@mci.com

Matthew Feil FDN Communications 2301 Lucien Way, Suite 200 Mailtland, FL 32751 Tel. No. (407) 835-0460 mfeil@mail.fdn.com

Bill L. Bryant, Jr.
Akerman Senterfitt
106 East College Avenue
Suite 1200
Tallahassee, FL 32301
Tel. No. (850) 224-9634
Bill.Bryant@akerman.com

D. Anthony Mastando
DeltaCom
VP-Regulatory Affairs
Senior Regulatory Counsel
Ste 400
7037 Old Madison Pike
Huntsville, AL 35806
Mary.Conquest@deltacom.com

Robert A. Culpepper

(+) Signed Protective Agreement

#502166

BellSouth Telecommunications, Inc. FPSC Dkt. No. 00121A-TP Responses to December 6, 2006 Workshop Action Items Filing Date: December 12, 2006 Item No. 3 Page 1 of 1

REQUEST:

For each year 2004 through 2006, please provide the number of BellSouth staff dedicated to working CLEC billing dispute transactions and the volume of disputes handled.

RESPONSE: BellSouth has a centralized workforce that handles billing adjustment requests, which includes Access Services sold via tariff, local interconnection and UNEs for CABS (Carrier Access Billing System) billed items for the entire region served by BellSouth. Therefore, the workforce levels required to resolve only local interconnection and UNE disputes, or to resolve CABS billed disputes for a specific state cannot be determined. Similarly, BellSouth has a separate group that handles billing disputes associated with resale and commercial agreements billed from CRIS (Customer Records Information System) and IBS (Integrated Billing System). This workforce level cannot be divided between these two types of disputes (resale vs. commercial agreements), or by state.

> Consequently, Attachment 1 shows the staffing levels for handling billing disputes for Access, Interconnection and UNE services and the total number of associated disputes resolved by that group. This attachment also provides the staffing levels for handling billing disputes related to resale & commercial agreements and the associated total number of disputes resolved by that group.

Intercon	ess, nection & NEs	Total Disputes	Svc Reps	Supv	Com	sale / mercial ements	Disputes	Svc Reps	Supv
					7.5.0	Circus	Disputes	керз	Supv
	Jan	53,381	70	6		Jan	1,977	23	2
	Feb	47,966	71	6		Feb	2,577	23	2
	Mar	43,998	71	6	-	Mar	2,116	23	2
4. 1	Apr	31,308	70	6		Apr	1,740	23	2
	May	73,691	70	6		May	1,95 <i>7</i>	23	, 2
2006	Jun	75,690	69	6	2006	Jun	2,183	23	2
	Jul	54,100	69	5		jul	1,714	23	2
	Aug	69,316	65	5		Aug	1,995	23	2
	Sep	41,198	65	5		Sep	1,816	21	2
	Oct	66,259	63	5		Oct	1,521	20	2
	Nov	N/A	63	5		Nov	N/A	19	2
	Dec	N/A	N/A	N/A		Dec	N/A	N/A	N/A
		556,907					19,596		
	cess,					esale /	19,596		
Intercon	nection &	Total	Svc Reps	Supv	Com	mercial		Svc Reps	Supv
Intercon	nection & NEs	Total Disputes	Reps	Supv	Com	mercial ements	Disputes	Reps	Supv
Intercon	nection & NEs Jan	Total Disputes 55,313	Reps 78	. 7	Com	mercial cements Jan	Disputes 2,766	Reps 30	Supv 2
Intercon	nection & NEs	Total Disputes	Reps		Com	mercial ements	Disputes	Reps	
Intercon	nection & NEs Jan	Total Disputes 55,313	Reps 78	. 7	Com	mercial cements Jan	Disputes 2,766	Reps 30	2
Intercon	nection & NEs Jan Feb	Total Disputes 55,313 33,923	78 78	. 7	Com	Jan Feb	Disputes 2,766 2,225	30 29	2
Intercon Ul	Jan Feb Mar	Total Disputes 55,313 33,923 55,432	78 78 78 79	. 7 7 7	Com Agre	Jan Feb Mar	2,766 2,225 3,433	30 29 29	2 1 2
Intercon	Jan Feb Mar Apr	Total Disputes 55,313 33,923 55,432 56,334	78 78 78 79 70	. 7 7 7	Com	Jan Feb Mar Apr	2,766 2,225 3,433 3,408	30 29 29 29	2 1 2
Intercon Ul	Jan Feb Mar Apr May	Total Disputes 55,313 33,923 55,432 56,334 101,872	78 78 79 70 70	. 7 7 7 7	Com Agre	Jan Feb Mar Apr May	2,766 2,225 3,433 3,408 2,087	Reps 30 29 29 24 24	2 1 2 1 2
Intercon Ul	Jan Feb Mar Apr May Jun	Total Disputes 55,313 33,923 55,432 56,334 101,872 84,238	78 78 79 70 70 68	. 7 7 7 7 7	Com Agre	Jan Feb Mar Apr May Jun	2,766 2,225 3,433 3,408 2,087 2,740	Reps 30 29 29 24 24 24	2 1 2 1 2
Intercon Ul	Jan Feb Mar Apr May Jun Jul	Total Disputes 55,313 33,923 55,432 56,334 101,872 84,238 56,407	78 78 79 70 70 68 68	. 7 7 7 7 7 7	Com Agre	Jan Feb Mar Apr May Jun Jul	2,766 2,225 3,433 3,408 2,087 2,740 2,814	Reps 30 29 29 24 24 24 24	2 1 2 1 2 2 2
Intercon Ul	Jan Feb Mar Apr May Jun Jul Aug	Total Disputes 55,313 33,923 55,432 56,334 101,872 84,238 56,407 53,394	78 78 79 70 70 68 68 68	7 7 7 7 7 7 6	Com Agre	Jan Feb Mar Apr May Jun Jul Aug	2,766 2,225 3,433 3,408 2,087 2,740 2,814 2,437	Reps 30 29 29 24 24 24 24 24 23	2 1 2 1 2 2 2

Action	etion Item 3 Wholesale Billing Disputes – Staffing and		ing and V	Volume	Attachment 1				
	Dec	51,479	69	6		Dec	2,022	22	2
		865,515					30,200		
Access, Interconnection &		Total	Svc		3	sale /			
	NES .	Disputes	Reps	Supv	•	mercial ements	Disputes	Svc Reps	Supv
	Jan	143,670	85	7		Jan	3,046	30	2
	Feb	72,127	85	7		Feb	3,374	30	2
	Mar	174,160	84	7		Mar	2,493	29	2
·	Apr	95,066	83	7		Apr	2,250	29	2
	Мау	139,552	83	7		May	2,401	29	2
2004	Jun	131,100	82	7	2004	Jun	2,243	28	2
2	Jul	33,104	81	7	ã	Jul	2,670	28	2
	Aug	130,665	81	7		Aug	2,046	28	2
	Sep	55,396	81	7		Sep	1,856	28	2
	Oct	50,289	80	7		Oct	2,027	28	2
	Nov	40,202	80	7		Nov	1,753	28	2
	Dec	81,973	80	7		Dec	2,461	28	2
		1,147,304					28,620		

BellSouth Telecommunications, Inc. FPSC Dkt. No. 00121A-TP Responses to December 6, 2006 Workshop Action Items Filing Date: December 12, 2006

Item No. 4 Page 1 of 1

REQUEST: Please provide BellSouth's average turn-around time for responding to

billing disputes for large retail customers

RESPONSE: BellSouth does not have a dedicated group to handle billing disputes for large retail customers. When a large retail customer has a question or dispute concerning billing, the customer typically contacts either its Account Executive (AE) or Customer Sales Associate (CSA). Both the AEs and CSAs handle a variety of issues from the customer, not just billing issues, and the average response times for these retail billing dispute resolutions are not systematically tracked. Consequently, BellSouth cannot provide average turn-around times for these disputes. However, retail disputes originated from BellSouth's Collection center are captured. This occurs when the customer initiates a billing dispute during the collection process. Data for the past four years are summarized in the table below.

Year	Total Disputes	Disputes Resolved Within 60 Calendar Days	Percent Resolved Within 60 Calendar Days	Average Time to Resolve (Calendar Days)
2003	10606	4090	38.56%	46
2004	8584	5072	59.09%	34
2005	12990	6101	46.97%	32
2006	7362	3802	51.64%	40

BellSouth Telecommunications, Inc. FPSC Dkt. No. 00121A-TP Responses to December 6, 2006 Workshop Action Items Filing Date: December 12, 2006 Item No. 6 Page 1 of 1

REQUEST:

Since the inception of PAP, please provide all occurrences of SEEM reposting, including the data month reposted, the date reposted, and any associated penalties for late reposting.

RESPONSE: There has only been one instance where BellSouth reposted SEEM data. This occurred for the August 2004 data month. Specifically, BellSouth made SEEM payments and posted the associated PARIS reports on 10/13/2004. Subsequently, due to a special data run for Hurricane Charley, BellSouth made a second SEEM payment and reposted the associated PARIS reports on 10/28/04. The second SEEM payment was issued in order to pay Provisioning and M&R measures for the first two weeks for all wire centers and for the last two weeks in the wire centers that were not affected by Hurricane Charley. Other than interest charges due to the late payments, no penalties were paid as a result of such reposting.