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December 11, 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,

/s/ Robert A. Culpepper

Robert A. Culpepper

Enclosures

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

660913

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 11th day of December, 2006 to the following:

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/s/ Robert A. Culpepper

Robert A. Culpepper

**(+) Signed Protective
Agreement**

REQUEST: In response to BellSouth's Action Item 1 filed on November 20, 2006, please provide a rewrite of the exclusion for bundled transactions or excessive volumes for measures OSS-1 and PO-2. Rewrite should denote that exclusion applies to the individual CLEC(s) that exceeded order volumes. Additionally, please provide language to be incorporated in these measures to ensure notification to a specific CLEC that exceeded order volumes and notification to the CLEC community if transactions are excluded.

RESPONSE: "BellSouth may exclude transactions submitted by an individual CLEC that are an unanticipated significant increase in the volume of transactions submitted by that individual CLEC. An unanticipated, significant increase in CLEC volume is indicated by either a 100% increase over the individual CLEC's forecasted volumes or the average of the normalized volumes for the most recent prior six month. BellSouth will notify the individual CLEC whose transactions caused this exclusion to be invoked, and will provide general notification to CLECs that such transactions were excluded."

Note: This exclusion will only be applied when the individual CLEC's transactions result in a failure of the metric.

REQUEST: Please provide the impact of changing the standard for the B-10 measure from 90% in 45 business days to 95% in 40 business days.

RESPONSE: The chart below summarizes the performance results for the months March – August 2006 if the benchmark for the B-10 measure had been 95% in 40 business days.

Month	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Mar-06	95% <= 40 Business Days	7928	7931	99.96%
Apr-06	95% <= 40 Business Days	2311	2377	97.22%
May-06	95% <= 40 Business Days	4648	4682	99.27%
Jun-06	95% <= 40 Business Days	3805	3825	99.48%
Jul-06	95% <= 40 Business Days	23595	23598	99.99%
Aug-06	95% <= 40 Business Days	8531	8569	99.56%

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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 will provide a response to this action item on 12/12/06.

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REQUEST: Please provide BellSouth's average turn-around time for responding to billing disputes for large retail customers

RESPONSE: BellSouth will provide a response to this action item on 12/12/06.

REQUEST: Since the inception of PAP, please provide all occurrences of SQM reposting, including the specific performance measure(s) reposted, the data month reposted, the date reposted, and any associated penalties for late reposting.

RESPONSE: The table below provides the requested information relative to SQM reposting for Florida since the time that the reposting policy was put into place.

Data Month	Date Reposted	Reposting Penalties	Measures Reposted
Mar-03	01-May-03	\$5,600	O-3: Percent Flow Through Service Requests
Apr-03	02-Jun-03	\$1,200	O-3: Percent Flow Through Service Requests
Jun-03	01-Aug-03	\$2,000	O-10: Service Inquiry with LSR FOC
Aug-03	01-Oct-03	\$2,400	O-10: Service Inquiry with LSR FOC, CM-6: Change Management Percent Software Errors Corrected
Jul-04	01-Sep-04	\$70,400	P-13D: LNP-Disconnect Timeliness (Non-Trigger)
Sep-04	01-Nov-04	\$46,000	P-13D: LNP-Disconnect Timeliness (Non-Trigger)
Oct-04	01-Dec-04	\$34,000	OSS-3: OSS Availability (Maintenance & Repair), O-11: Firm Order Confirmation and Reject Response Completeness, O-9: Firm Order Confirmation Timeliness, O-8: Reject Interval, PO-2: Percent Responses Received
Nov-04	03-Jan-05	\$13,200	OSS-3: OSS Availability (Maintenance & Repair)
Dec-04	01-Feb-05	\$11,600	P-13D: LNP-Disconnect Timeliness (Non-Trigger), O-11: Firm Order Confirmation and Reject Response Completeness, O-9: Firm Order Confirmation and Reject Response Completeness, O-8: Reject Interval
May-05	01-Jul-05	\$14,400	P-9: Percent Provisioning Troubles & P-7: Coordinated Customer Conversions - % Provisioning Troubles
Jun-06	26-Sep-06	\$26,800	PO-2: Loop Make-up Electronic, O-9: Firm Order Confirmation and Reject Completeness
Total		\$227,600	

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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: BellSouth will provide a response to this action item on 12/12/06.

REQUEST: Please provide the sample size, by month, for Examples 1 and 2 contained in Item No. 7 of BellSouth's November 20, 2006 filing.

RESPONSE: The sample sizes, by month, used for Examples 1 and 2 of Item No. 7 in BellSouth's November 20, 2006 filing are provided below:

Example 1: CLEC A – Percent Flow Through					
Month	Product Group Description	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Oct-05	Business	90%	53	56	94.64%
Nov-05	Business	90%	71	75	94.67%
Dec-05	Business	90%	77	88	87.50%
Jan-06	Business	90%	83	88	94.32%
Feb-06	Business	90%	44	48	91.67%
Mar-06	Business	90%	53	61	86.89%
Apr-06	Business	90%	42	44	95.45%
May-06	Business	90%	37	42	88.10%
Jun-06	Business	90%	53	60	88.33%
Jul-06	Business	90%	62	65	95.38%
Aug-06	Business	90%	55	60	91.67%
Sep-06	Business	90%	90	101	89.11%
Total	Business	90%	720	788	91.37%
Example 2: CLEC A – Reject Interval					
Month	Product Group Description	Benchmark	CLEC Numerator	CLEC Volume	CLEC Metric
Aug-06	Non-Mechanized	95%	30	32	93.75%
Jul-06	Non-Mechanized	95%	28	30	93.33%
Jun-06	Non-Mechanized	95%	26	26	100.00%
May-06	Non-Mechanized	95%	28	29	96.55%
Apr-06	Non-Mechanized	95%	16	16	100.00%
Mar-06	Non-Mechanized	95%	42	44	95.45%
Feb-06	Non-Mechanized	95%	27	27	100.00%
Jan-06	Non-Mechanized	95%	47	51	92.17%
Dec-05	Non-Mechanized	95%	46	46	100.00%
Nov-05	Non-Mechanized	95%	21	24	87.50%
Oct-05	Non-Mechanized	95%	32	32	100.00%
Total	Non-Mechanized	95%	343	357	96.08%