

March 21, 2007

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MAR 232007

PUBLIC SERVICE COMMISSION

Beth O'Donnell Executive Director Public Service Commission 211 Sower Blvd., PO Box 615 Frankfort, KY 40602

Re: Petition of SouthEast Tel., Inc., for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection Under the Telecommunications Act of 1996, Case No. 2006-00316

Dear Ms. O'Donnell:

SouthEast Telephone, Inc. ("SouthEast") submits this letter in response to the March 14, 2007 letter from Mary K. Keyer of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("BellSouth") to the undersigned, with a copy filed in the docket of this proceeding, regarding BellSouth's Self-Effectuating Enforcement Mechanisms ("SEEM") and Service Quality Measurement ("SQM") data. BellSouth challenges the statement in SouthEast's Post-Hearing Brief (at 21) that SouthEast has no access to BellSouth's SEEM data.

To be more precise: while SouthEast has access to the SEEM/SQM databases, SouthEast has no access to performance data, whether through those or any other systems, that compare the quality of BellSouth's service to <u>SouthEast's</u> customers versus the quality of BellSouth's service to BellSouth's <u>own</u> customers <u>within the area served by SouthEast</u>. SouthEast can review BellSouth's performance data regarding service quality to BellSouth's own customers on a <u>statewide average</u> basis versus service quality for all CLEC customers on a <u>statewide average</u> basis (as well as SouthEast-specific data). But SouthEast has no access to BellSouth's SEEM/SQM performance data specific to the 56 rural counties served by SouthEast.

As SouthEast witness Robin Kendrick testified, in SouthEast's experience, BellSouth often provides a much lower quality of maintenance and repair service to SouthEast's customers than to its own customers in this area. *See* Kendrick Direct Testimony at 6. SouthEast stands by the remedies it proposes to effectively address these problems.

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In a separate letter filed on March 19, 2007, Ms. Keyer wrote, "Both parties have filed their briefs in this case and the case should stand before the Commission on the record before it.... [BellSouth], therefore, requests that Mr. Brent's letter of March 12, 2007, be excluded from the record in this case." BellSouth's reasoning applies with equal force to the company's own letter. SouthEast submits that BellSouth's March 14, 2007 letter should be excluded from the record of this proceeding and that the case should stand before the Commission on the record before it.

For the reasons stated in SouthEast's brief, the Commission should find for SouthEast on Issue A-8 regarding Dispatched/No Trouble Found" charges. Please contact me if you have any questions.

Respectfully submitted,

David Dieradyki

David L. Sieradzki Counsel for SouthEast Telephone, Inc.

cc: Amy E. Dougherty Mary K. Keyer Andrew D. Shore Darrell Maynard