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January 17, 2008

VIA FEDERAL EXPRESS

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

RECEIVED

JAN 18 2008

**PUBLIC SERVICE
COMMISSION**

Re: Notice to Global Connections, Inc., re SEEMs Payments

Dear Ms. O'Donnell:

Please find enclosed correspondence relating to the notice that BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky ("AT&T Kentucky") sent to a competitive local exchange carrier regarding payments not due under the Tier-1 or Tier-2 Enforcement Mechanisms for non-compliance with a performance measure under Section 4.5.1 of the SEEM Administrative Plan.

A portion of the attachment to that correspondence contains commercial, or proprietary information and, pursuant to 807 KAR 5:001, Section 7, enclosed is AT&T's Request for Confidentiality. A copy of the proprietary information, as well as an edited version of that information, is attached.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

Enclosures

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EDITED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

REQUEST FOR CONFIDENTIAL TREATMENT OF THE
ATTACHMENTS TO AT&T KENTUCKY'S JANUARY 17, 2008 LETTER
RE NOTICE TO GLOBAL CONNECTIONS, INC. RE: SEEMS PAYMENTS

BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky ("AT&T Kentucky"), by counsel, requests the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), pursuant to KRS 61.878 and 807 KAR 5:001, § 7, to classify as confidential the highlighted information contained in the spreadsheet attached to AT&T Kentucky's January 17, 2008 letter to the Commission. The material that is highlighted contains information that is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 or under protective agreements with CLECs to which AT&T Kentucky is a party.

The Kentucky Open Records Act exempts certain information from the public disclosure requirements of the Act, including information of certain commercial information, and also information the disclosure of which is prohibited by federal law or regulation. KRS 61.878(1)(c)1 and 61.878(1)(a)(k).

To qualify for the commercial information exemption and, therefore, keep the information confidential, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors and the parties seeking confidentiality if openly discussed. KRS 61.878(1)(c)1; 807 KAR 5:001 § 7.

All of the information for which AT&T Kentucky seeks confidentiality contains customer-specific information, specifically, information regarding Firm Order Confirmation Timeliness Results and Reject Time Results information. This information

is specific to Global Connections, Inc. in the conduct of its business with AT&T Kentucky.

The highlighted information provided in these attachments is considered confidential business information related to the competitive interests of AT&T Kentucky and Global Connections, Inc., that is proprietary and confidential to both Parties. These documents are not publicly available and disclosure of this data would impair the competitive business and cause harm to AT&T Kentucky and Global Connections, Inc. Public disclosure of the identified information would provide competitors, namely CLECs, with an unfair competitive advantage.

The Commission should also grant confidential treatment to the information for the following reasons:

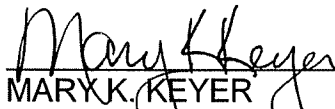
- (1) The information for which AT&T Kentucky is requesting confidential treatment is not known outside of AT&T;
- (2) The information is not disseminated within AT&T Kentucky and is known only by those of AT&T Kentucky's employees who have a legitimate business need to know and act upon the information;
- (3) AT&T Kentucky seeks to preserve the confidentiality of this information through appropriate means, including the maintenance of appropriate security at its offices; and
- (4) By granting AT&T Kentucky's request, there would be no damage to any public interest.

In addition, information provided to the Commission in the spreadsheet attached to AT&T Kentucky's January 17, 2008, letter concerning a specific customer is customer

proprietary network information ("CPNI") and should not be publicly disclosed without the approval of the individual customer. Disclosure of customer-specific information is subject to obligations under Section 222 of the Communications Act of 1937 as amended by the Telecommunications Act of 1996. Federal law imposes the obligation to maintain the confidentiality of such information from public disclosure when the disclosure of such information or records is prohibited by federal law or regulation. Therefore, because CPNI is protected from disclosure by federal law, this information should be afforded proprietary treatment.

For the reasons stated herein, the Commission should grant AT&T Kentucky's request for confidential treatment of the identified information.

Respectfully submitted,



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COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.,
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Sent via Electronic and Certified Mail

January 11, 2008

Bassam Abdallah
Director of Operations
Global Connection Inc. of America
3957 Pleasantdale Road
Atlanta, GA 30340

Re: Notice of AT&T's exercise of Section 4.5.1 of the SEEM Administrative Plan

Dear Mr. Abdallah:

Section 4.5.1 of the SEEM Administrative Plan provides in relevant part that AT&T is not "obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms for non-compliance with a performance measure if such non-compliance results from a CLEC[']s acts or omissions that cause failed or missed performance measures. These acts or omissions include but are not limited to, accumulation and submission of orders at unreasonable quantities or times, failure to follow publicly available procedures, or failure to submit accurate orders or inquiries."¹ On several days in November 2007, Global Connection Inc. of America ("Global Connection") submitted a greatly increased quantity of local service requests ("LSRs"). Further, these submissions were not made in accordance with applicable AT&T ordering guidelines.

Global Connection's submission of such orders resulted in AT&T's inability to meet the SQM measurement standard associated with two ordering metrics -- the Reject Interval O-8 [RI] measurement and the Firm Order Confirmation Timeliness O-9 [FOCT] measurement in several states.² Accordingly, please be advised that pursuant to Section 4.5.1 of the SEEM Plan, AT&T is not obligated to pay SEEM payments associated with RI and FOCT for the month of November 2007, because the SEEM liability associated with such measures was triggered by Global Connection's actions.³

¹ Alabama SEEM Plan, Version 2.01 (July 1, 2006), Georgia SEEM Plan, Version 3.0 (August 1, 2005); Kentucky SEEM Plan, Version 3.00 (August 1, 2005), North Carolina SEEM Plan, Version 2.01 (July 1, 2006); South Carolina SEEM Plan, Version 2.01 (May 1, 2006). Tennessee SEEM Plan, Version 3.00 (August 1, 2005).

² Both measures were missed in Alabama, Georgia, North Carolina, South Carolina, and Tennessee. Only the FOCT measure was missed in Kentucky.

³ Global Connection's interconnection agreement ("ICA") incorporates by reference the SQM/SEEM plan. *See* ICA, Attachment 9.

Specifically, on several dates in November 2007, Global Connection submitted thousands of LSRs.⁴ Global Connection substantially increased its LSR submission volume without providing a forecast in advance of such submissions and without working with AT&T to establish project coordination. Global Connection has an obligation to submit orders as outlined in AT&T's ordering guidelines.⁵ Global Connection's failure to follow such guidelines placed an extraordinary demand on AT&T's ability to process such orders within the applicable performance intervals and resulted in AT&T missing the RI and FOCT measures through no fault on AT&T's part.

Enclosed for your review are two documents which show the FOCT and RI results for the month of November 2007, for: (i) Global Connection; (ii) all other competitive local exchange carriers ("CLECs") operating in the AT&T's Southeast region; and (iii) combined results for all CLECs, including Global Connection. As you can see, Global Connection's performance results are substantially lower than the performance results for all other CLECs for both measurements. Again, Global Connection's results are directly and exclusively attributable to Global Connection's failure to follow applicable ordering guidelines and its decision to substantially increase its volume of LSRs submission towards the end of November. The SEEM liability that is being withheld is also set forth in the enclosed FOCT and RI documents.

In sum, Global Connection's submission of LSRs in increased quantities and without adhering to applicable ordering guidelines caused AT&T to miss the RI and FOCT performance measures in November 2007. As a result thereof, and in accordance with Section 4.5.1 of the SEEM Plan, AT&T will not pay Global Connection any SEEM remedies associated with such measures for the month of November 2007.

Sincerely,



Kristen Shore

Enclosures

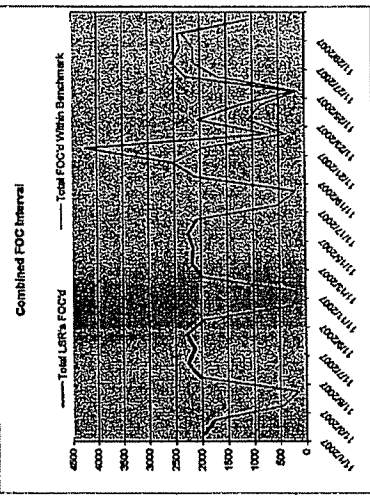
cc: Alabama Public Service Commission
Georgia Public Service Commission
Kentucky Public Service Commission
North Carolina Public Service Commission
South Carolina Public Service Commission
Tennessee Regulatory Authority

⁴ These dates include, but are not limited to, November 21, 23, 24, 27, 28, and 29.

⁵ ICA, Attachment 6, § 2.1.3 obligates Global Connection to abide by AT&T's electronic interface guidelines. The relevant guideline is AT&T's Operations Support Systems (OSS) Interconnection Volume Guidelines, (Version 7.0, issued September 2007). In submitting LSRs in the volume and manner that occurred in November 2007, Global Connection failed to follow the requirements of Section 2 of the aforementioned guidelines. A copy of the OSS volume guidelines is enclosed with this letter. The guidelines are also available on the web at the following address: http://wholesale.att.com/reference_library_guides/leo/assets/pdf/oss_volume_guidelines.pdf

Global Connection
Summary of LSR Submissions

Submission Date	Total FOC'd Within Benchmark	Total LSR's FOC'd	Percent Within Benchmark (85% or 10 hours)
11/12/2007	1839	1980	97.93%
11/12/2007	1733	1784	97.14%
11/22/2007	441	445	99.10%
11/22/2007	143	143	99.30%
11/22/2007	142	142	97.89%
11/22/2007	1989	2042	97.35%
11/22/2007	2235	2272	98.33%
11/22/2007	2102	2150	97.77%
11/22/2007	2261	2300	98.30%
11/22/2007	1931	1963	98.37%
11/22/2007	254	254	99.61%
11/22/2007	144	144	97.92%
11/22/2007	1863	2015	97.42%
11/22/2007	2150	2180	98.62%
11/22/2007	2125	2160	98.38%
11/22/2007	2216	2246	98.66%
11/22/2007	2055	2091	98.28%
11/22/2007	524	528	99.24%
11/22/2007	170	171	99.42%
11/22/2007	2070	2104	98.38%
11/22/2007	2510	2535	99.01%
11/22/2007	1987	2033	97.74%
11/22/2007	348	348	100.00%
11/22/2007	1081	1081	100.00%
11/22/2007	847	847	100.00%
11/22/2007	130	130	100.00%
11/22/2007	1587	1587	100.00%
11/22/2007	2123	2123	100.00%
11/22/2007	2123	2123	100.00%
11/22/2007	2328	2328	100.00%
11/22/2007	1049	1049	100.00%
11/22/2007	44824	50618	88.56%
Total			



SEEM Calculation:
Alabama
Georgia
Kentucky
North Carolina
South Carolina
Tennessee

Not for disclosure outside of AT&T without written permission

EDITED



Operations Support Systems (OSS) Interconnection Volume Guidelines

Version 7.0

September 2007

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September 2007

Page 1 of 10

Disclaimer

This documentation is for general information purposes only and does not obligate AT&T SE to provide services specifically in the manner described herein and is subject to updated changes. AT&T SE will provide reasonable notification of changes to this documentation through the CLEC Carrier Notification process. Nothing herein shall be deemed to limit or modify any right or obligation of AT&T SE or the user of this documentation.

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1. About This Document

1.1 Purpose

The purpose of this document is to provide AT&T SE's Operations Support Systems (OSS) Volume Guidelines. This document does not replace any existing AT&T SE documents relative to Interconnection to AT&T SE's OSS.

The Operations Support Systems (OSS) referenced in this document are:

Electronic Data Interchange (EDI)
Telecommunications Access Gateway Extensible Markup Language (TAG XML)
Local Exchange Navigation System (LENS)

1.2 Intended Audience

The intended audience for this guide is Competitive Local Exchange Carriers (CLECs) who utilize AT&T SE OSSs.

1.3 Document Summary

This section summarizes the changes to this document as it is updated. Corrections of typographical errors, minor re-wording of sentences for clarity, and formatting changes are not included in this summary.

DOCUMENT HISTORY

Version Number	Revision Date	Description of Revision
1.0	April 2004	Initial Document
2.0	July 2004	Revised Document
3.0	September 2004	Revised Document from 8/19/04 Conference Call with CLECs
4.0	November 2004	Revised Document from 10/27/04 Conference Call with CLECs
5.0	February 2005	Revised Document from 1/20/05 Conference Call with CLECs <ul style="list-style-type: none">• Page 2 – Revised Disclaimer• Section 2.3 – Removed reference to hourly/daily volume• Section 2.3 – Clarified reasonable distribution of daily and hourly OSS transactions• Section 2.5 – Added reference to current escalation process for handling backlogs of data• Section 2.6 Impacts to Performance Measurements - Deleted

6.0	August 2006	Revised to include loop make up transactions in the forecast process. <ul style="list-style-type: none"> • Section 2.2-Added verbiage to include loop make up as a transaction in volume projection. • Section 2.2- Added reference link for additional information for loop make up. • Appendix A- Updated forecast template to include separate section for Loop Make-Up transactions.
7.0	September 2007	Update to re-brand document, all sections. Modified Attachment A to change date to 2008

2. AT&T SE Volume Guidelines

2.1 Annual OSS Transaction Volume Forecast

AT&T SE requires volume forecast to be provided on an annual basis by each CLEC. Volume forecast should be submitted to its AT&T SE E-Commerce Account Team Representative. The Volume Forecast should be provided for the upcoming year by November 1 (Example: 2005 Annual Forecast should be provided by November 1, 2004). The AT&T SE OSS Transaction Projection/Forecast Form in Appendix A should be utilized to provide the forecast.

AT&T SE has responsibility for ensuring its systems meet current and future volume needs. The forecast will provide information that will assist AT&T SE with scaling applications appropriately. It will also provide information that can be utilized by AT&T SE to minimize negative impacts from activities of one user to another.

The purpose of the OSS Interconnection Volume Guidelines is to assist in sizing AT&T SE's OSS by understanding the volume of transactions that CLECs may send on a daily and hourly basis. The Guidelines are not intended to stop or delay CLEC orders. In the event that AT&T SE detects a spike in CLEC ordering that will cause the CLEC to exceed the guidelines, AT&T SE may contact the CLEC to determine the cause for the increase and discuss ways in which the increased volume can be handled.

Volume forecast will be treated as proprietary in nature and will only be used for the purposes of OSS performance management.

2.2 Forecast Volume Categories

For purposes of forecast development for EDI/TAG XML users, the following table reflects volume categories based upon average total Pre-Order, Firm Order and Loop Make Up transactions (does not include supplemental transactions). For additional information and details for loop make up transactions, please refer to:

http://wholesale.att.com/reference_library/guides/unedocs/bstlmu.doc

Category	Description
High Volume	501+ Firm Order/Pre Order Transactions Per Day
Medium Volume	101-500 Firm Order/Pre Order Transactions Per Day
Low Volume	<100 Firm Order/Pre Order Transactions Per Day

CLECs in the Low Volume Category do not need to provide an annual forecast.

If a CLEC that falls within the High or Medium Volume category does not provide an annual forecast by November 1 for the upcoming year, AT&T SE will develop a forecast for the CLEC by December 1 (Example: AT&T SE would provide the 2005 Annual Forecast by December 1, 2004). AT&T SE's forecast will be based upon the past twelve (12) month's data. If the CLEC disagrees with the forecast provided by AT&T SE, the CLEC may send AT&T SE a revised forecast no later than December 15.

If a CLEC knows or has reason to believe its volumes may exceed those on their annual forecast, the CLEC should contact their AT&T SE E-Commerce Account Team Representative to advise and provide a revised volume forecast. AT&T SE requires a thirty (30) day advance notice of changes in projected Pre-Order and Firm Ordering volumes.

If the acquisition or merger of one CLEC with another results in the changes of the original forecast provided by the CLECs to AT&T SE, then the impacted CLEC should contact their AT&T SE E-Commerce Account Team Representative to provide a revised volume forecast. Forecasts may be provided for each company Operating Company Number (OCN) or collectively dependent upon the conditions of the merger/acquisition.

2.3 Daily Volume Distribution

If a CLEC chooses to bundle Local Service Requests ("LSRs") and transmit them to AT&T SE simultaneously in a large group, then the following

guidelines should be adhered to in order to ensure that no CLEC's activities negatively impact all CLEC users.

Pre-order transactions that are submitted real-time, as received, will not be subject to these guidelines. These guidelines will apply to any type of pre-order transaction that the CLEC chooses to bundle and not send in real-time as received as well as all order transactions submitted via TAG XML or EDI.

For clarification, LENS is a web-based system that provides CLECs with the capability to submit pre-order and order transactions on a real-time basis. CLECs should submit transactions via LENS following the LENS User Guide and must not use any mechanical process to log into or otherwise utilize the LENS system. Therefore, requirements in this section regarding daily volume transactions do not apply to LENS transactions.

A CLEC's average daily volume should be reasonably distributed as noted below, by OSS, during the time specified in the OSS Hours of Availability Detail by Transaction Type/Group. These OSS hours of availability can be found at http://www.interconnection.AT&T SE.com/oss/oss_hour.html, page 2.

AT&T SE's Pre-Ordering applications support an event driven model which provides for a near real-time experience to CLECs. It is AT&T SE's expectation that CLECs will communicate to AT&T SE by submitting pre-orders real-time as well and not hold or bundle pre-order transactions.

Should any CLEC exercise its capability to bundle pre-orders for any of AT&T SE's OSS, those transactions will be governed by these daily volume guidelines.

AT&T SE designs its OSS to accommodate both the current and projected aggregate demand for all CLECs based on agreed upon forecasts for the current year. Each CLEC should reasonably distribute its daily and hourly OSS transactions in an effort not to exceed the aggregate capacity that AT&T SE's OSS has been sized to support.

2.4 Forecasting Special Projects

Large volumes of Local Service Requests (LSRs) that are not contemplated in the annual forecast that would place extraordinary demand/stresses on AT&T SE OSS and provisioning applications are considered additional volumes. Additional volumes or special projects should be reasonably distributed on a daily and hourly basis, as stated in Section 2.3.

Scheduling of additional volume or special projects, i.e., those transactions which would cause a CLEC to exceed a reasonable distribution of its daily and hourly volume should be coordinated and scheduled through the AT&T SE E-Commerce Account Team ("ECAT"). For example, if a CLEC anticipates that it will have bulk migrations or batch hot cuts that may cause its hourly volume distribution to exceed the requirements of such guidelines, the CLEC should contact the ECAT to advise and work together to schedule such transactions.

Transactions submitted on behalf of the CLEC by AT&T SE are not included in the CLEC's Daily Volume Distribution as stated in Section 2.3. Transactions submitted on behalf of the CLEC by a Vendor/Service Bureau are included in the Daily Volume Distribution as stated in Section 2.3. CLECs agree to work with their Vendor/Service Bureau to ensure the requirements of the OSS Volume Guidelines are met.

2.5 Management of Backlogs of Data

If a CLEC finds it needs to send a backlog of data (CLEC hardware failure, vendor outages, weekend maintenance, etc.), the CLEC should send its transactions following the daily volume distribution guidelines in Section 2.3.

If a CLEC needs to submit orders for processing that may exceed these guidelines, the CLEC should contact its AT&T SE E-Commerce Account Team (ECAT) Representative to advise and work together on scheduling these transactions. The CLEC should provide its ECAT representative with a proposal containing the CLECs preferred method for handling the backlog (number of orders per hour, hours during which the backlog will be sent, etc).

Given the importance of timely order processing to CLEC's ability to do business, AT&T SE will work with the CLEC to schedule these transactions as expeditiously as possible.

The response from AT&T SE will include either:

- 1) Acceptance of the CLECs preferred method of sending the backlog (number of orders per hour, hours during which the backlog will be sent, etc.) or
- 2) Rejection of the CLEC's preferred method of sending the backlog and a detailed description of AT&T SE's preferred method of receiving the backlog (number of orders per hour, hours during which the backlog will be sent, etc).

For AT&T SE system outages, CLECs are notified via the System Outage Notification Process. Should a backlog of data be created as a result of a AT&T SE system outage, AT&T SE will contact and work with the CLEC to schedule the transactions as expeditiously as possible. Current E-Commerce Account Team escalation procedures should be followed if necessary.

Backlogs created as a result of a Release will be managed in accordance with current release management practices. These practices incorporate an expectation of increased volume once the applications become available.

2008 AT&T SE OSS Transaction Projection/Forecast

Competitive Local Exchange Carrier (CLEC) Name:

Company Code(s), OCNs or Trading Partner IDs:

PRE-ORDER

Total Volumes	Total Transaction* Projection /Forecast Jan-Dec	Expected High Volume Month	Avg. Daily Volume	Peak Hourly Volume (Typical Day)
OSS				
EDI				
Tag XML				

EXAMPLE For Total Pre-Order Transaction Forecast
 Number of pre-order transactions per month x 12 months (Jan-Dec) = Total number of pre-order transactions
 40,000 per month x 12 months = 480,000 total
 Note: Example also applies to firm order & loop make-up transactions

Firm Order

Total Volumes	Total Transaction* Projection /Forecast Jan-Dec	Expected High Volume Month	Avg. Daily Volume	Peak Hourly Volume (Typical Day)
OSS				
EDI				
Tag XML				

Loop Make Up

Total Volumes	Total Transaction* Projection /Forecast Jan-Dec	Expected High Volume Month	Avg. Daily Volume	Peak Hourly Volume (Typical Day)
OSS				
EDI				
Tag XML				

Primary Contact

Name:	
Tel. Number	
E-Mail Address	

* A transaction is defined as initial firm orders (not supplemental orders) and pre-order queries.