April 2, 2009

Via UPS Overnight

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APR 03 2009

PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

Re: SouthEast Telephone, Inc., Complainant v. BellSouthTelecommunications, Inc. d/b/a AT&T Kentucky, Defendant Case No. 2008-00279

Dear Mr. Derouen:

Enclosed for filing in the above captioned case are the original and ten (10) copies of SouthEast Telephone Inc.'s Response to Data Requests of Commission Staff.

Thank you for your attention to this matter.

Sincerely,

Bowerpook

Bethany Bowersock In House Counsel SouthEast Telephone, Inc.

Cc: Parties of Record

Enclosures

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SOUTHEAST TELEPHONE, INC.)
Complainant)
v.) CASE NO. 2008-00279
BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A AT&T KENTUCKY)))
Defendant	,))

RESPONSE OF SOUTHEAST TELEPHONE, INC. TO DATA REQUEST OF <u>COMMISSION STAFF</u>

FILED: APRIL 3, 2009

Response to First Data Requests of Commission Staff Dated March 20, 2009

Case No. 2008-00279

Question No. 1

Responding Witness: Darrell Maynard

- Q-1. Refer to SouthEast's Response to Item 3 of the Commission's December 11, 2008 data request. Provide a reference to the interconnection agreement or other contract between the parties on which SouthEast relies to support its argument that BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky") should charge SouthEast a conversion charge of \$10.00 rather than the loop installation charges and port installation charges for converted lines.
- A-1. At the time that SouthEast requested the conversions, it was operating under an Interconnection Agreement from 2001. Under this Agreement, SouthEast was charged a \$10.00 conversion fee anytime a conversion from Resale to WLP or WLP to Resale was ordered. This charge is clearly outlined as USOC "USACC" in Exhibit C of Attachment 2 of the Parties 2001 Interconnection Agreement. SouthEast has also attached a page from its December 25, 2007 bill from AT&T. The USOC "USACC" is clearly depicted as having a \$10.00 corresponding fee. In addition, SouthEast attaches hereto a screenshot from an analysis of AT&T's invoice performed by Smart Telecom Concepts. This analysis also depicts the Resale to UNEP Conversion Cost Per Line as being \$10.00. In fact, SouthEast has always paid a conversion fee of \$10.00 anytime it has converted between two platforms. There is no difference in these conversions and the conversion to commingled elements. In both instances no physical installation is required. Therefore, an "installation" fee is unwarranted.

On February 12, 2009, the Parties executed a new Interconnection Agreement, in which Attachment 2, Section 1.4.4.1, dealt with the conversion of wholesale services to network elements by specifically stating, "Upon request, AT&T shall convert a wholesale service, or group of wholesale services, to the equivalent Network Element or Combination that is available to SouthEast pursuant to this Agreement. AT&T shall charge the applicable nonrecurring switch as is rates for conversions to specific Network Elements or Combinations found in Exhibit 1 of Attachment 2." The corresponding nonrecurring fee in this Exhibit is \$8.98.

Response to First Data Requests of Commission Staff Dated March 20, 2009

Case No. 2008-00279

Question No. 2

Responding Witness: Darrell Maynard

- Q-2. Refer to SouthEast's Response to Item 5 of the Commission's December 11, 2008 data request. Does SouthEast assume that every line in service is capable of being served by an unbundled copper loop non-designed (UCL-ND)? Explain the basis for your answer.
- A-2. SouthEast's Response to Item 5 of the Commission's December 11, 2008, data request, included only the lines served from an AT&T Central Office. SouthEast does assume that every line in service from a Central Office is capable of being served by an unbundled copper loop non-designed (UCL-ND). To date, the reasons AT&T has given for refusing to fill certain UCL-ND orders have failed to demonstrate that a UCL-ND is not actually available.

Morever, in placing its orders with AT&T, SouthEast assumes that it can order the UCL-ND for every line served from an AT&T Central Office because it must. Southeast is not provided any mechanism for determining otherwise. The Local Exchange Navigation System ("LENS") that AT&T provides to SouthEast does not offer the information necessary to confirm that a line is capable of being served by an UCL-ND, Only after SouthEast submits an order does AT&T hint that there is a problem. To date, it has excluded approximately thirty-nine percent (39%) of SouthEast's orders, based on superficial "qualifiers" that no one can audit, except AT&T. If SouthEast were permitted to use the same ordering systems that AT&T uses, the customer's ordering experience with SouthEast would be more on par with what they would experience with AT&T, as SouthEast is limited to what AT&T provides.

AT&T has, for example, denied orders that were served through a pair gain system. AT&T's rationale regarding pair gain based denials implies that the existence of a pair gain automatically means that there is no non-designed copper loops available from the Central Office to the customer's premises. However, just because the customer is currently served with a multiplexed loop using pair gain equipment to a node combined with a copper "last mile" loop to the customer's premises does not automatically mean that there is not a non-designed copper loop available. Because SouthEast does not have a system to determine if lines are served via this mechanism, it does assume that every line it orders from a Central Office can be converted to the UCL-ND. If AT&T would provide SouthEast with the same system it uses for qualifying lines, SouthEast would be

Response to First Data Requests of Commission Staff Dated March 20, 2009

Case No. 2008-00279

glad to audit its orders for the port commingled with the UCL-ND and adjust its requests for credits accordingly.

Response to First Data Requests of Commission Staff Dated March 20, 2009

Case No. 2008-00279

Question No. 3

Responding Witness: Darrell Maynard

- Q-3. Does SouthEast agree that every location it serves is capable of being served by an unbundled copper loop non-designed (UCL-ND)?
- SouthEast does not agree that every single location it serves is capable of being served by A.-3. an unbundled copper loop non-designed; however, the unbundled copper loop nondesigned is not the only element AT&T is required to commingle at SouthEast's request. AT&T stated in it's Reply to SouthEast Telephone's Response to AT&T Kentucky's Answer to SouthEast's Complaint, "AT&T recognizes that the Commission has ruled in its generic change of law docket (Case No. 2004-00427) that AT&T Kentucky has an obligation to commingle a network element obtained pursuant to Section 251 of the federal Telecommunications Act of 1996 with wholesale services or facilities, including services or facilities made available under Section 271 of the Act." AT&T's obligation to commingle elements and services is a broad one. SouthEast further disagrees with AT&T's assertion in its Response to SouthEast's Motion to Incorporate Additional Compliance Issues, that the only request at issue in this proceeding is the unbundled copper loop non-designed. In fact, SouthEast's Complaint in this proceeding specifically requests that the Commission, " Enter its Order, on an expedited basis, declaring that AT&T is required by the Change of Law Order to perform the functions necessary to attach commingled elements at SouthEast's request, without restriction and without reference to whether the location for which SouthEast submits a commingling order contains a collocation arrangement of SouthEast."

SouthEast understands, for example, that the UCL-ND may not work for those lines served via Remote Terminals, but contends that there is a network element that will work and that is priced lower than the \$31.11 Voice Grade Loop SouthEast has previously been forced to order in Zone 3. SouthEast has attempted on several occasions to place orders for a commingled arrangement for those lines served via remote terminals, but has not been met with cooperation from AT&T. In fact, on February 18, 2009, SouthEast requested, by letter mailed to AT&T's legal representative, a conference call with engineers **and** legal to discuss the proper manner for ordering the commingled elements SouthEast desires, and to which it is entitled. It is clear that the issues between the parties cannot be resolved unless experts in both the legal and technical fields are actively involved in the same meetings. However, SouthEast was unsuccessful in obtaining a conference with both technical and legal representatives of AT&T. Instead, SouthEast was encouraged to discuss this issue only with Jim Maziarz, AT&T's Lead Product

Response to First Data Requests of Commission Staff Dated March 20, 2009

Case No. 2008-00279

Manager. While SouthEast has found Mr. Maziarz to be helpful with engineering issues, he is not a legal expert with respect to the legal implications of the Kentucky Public Service Commission's Order in Case No. 2004-00427. That order entitles SouthEast to elements and services other than the UCL-ND, which is not the only element SouthEast wishes to commingle and which is not the only element at issue in this proceeding.

Response to First Data Requests of Commission Staff Dated March 20, 2009

Case No. 2008-00279

Question No. 4

Responding Witness: Darrell Maynard

- Q-4. Refer to AT&T Kentucky's Response to Item 2 of the Commission's December 11, 2008 data request. How many conversions has SouthEast actually ordered from AT&T Kentucky as of the date of this data request? How many of those circuit changes have been instituted as of the date of this data request?
- A-4. As of March 20, 2009, SouthEast has requested that 9,106 lines be converted from their current arrangement to a commingled arrangement. However, of these lines AT&T has rejected 3,600 orders (excluding February rejections that we have not yet received), which is approximately 39% of all commingling conversions being disqualified. Some of these orders were rejected as being served through a pair gain system, but the majority have been disqualified as being served via a remote terminal.

None of the conversion orders that SouthEast has placed have actually had a circuit change because AT&T chose to comply with the Commission's Change of Law Order by issuing SouthEast billing credits for the price difference. As of the date of this Response, AT&T has issued SouthEast billing credits for 5,506 lines (excluding February credits that SouthEast has not received at this time).

Response to First Data Requests of Commission Staff Dated March 20, 2009

Case No. 2008-00279

VERIFICATION

I hereby verify that the foregoing responses were prepared under my supervision and are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Carla Reichelderfer, COO/CFO

Subscribed and sworn before me this 2nd day of Aprill, 2009.

<u>ylende</u> Malte NOTARY PUBLIC, STATE AT LARGE

My commission expires 4 - 21 - 12.

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BELLSOUTH/SouthEast RATES NETWORK ELEMENTS AND OTHER SERVICES LOOP/PORT COMBINATIONS

Attachment 2 Exhibit C Rates - Page 53

DES	DESCRIPTION	usoc	AL	ΞE	GA	۶	٩	MS	NC	SC	TN
	2-wire voice unbundled res, low usage line port with Caller ID (LUM)	UEPAP	\$2.20	\$1.35	\$1.79	\$2.61	\$2.55	\$2.12	\$2.28	\$3.69	\$4.54
	2-Wire Voice Grade Line Port (Bus.), per month			\$4 JC	£1 70	e2 E4	¢7 55	\$2.12	\$7 2R	\$3.60	84 54
	2-wire voice unbundled port without Caller ID	UEPBL	\$2.20	91.30	01.19	10.26	\$2.3J	\$2.12 \$2.12	\$7 7R	\$3.60	\$4.54 \$4
+	2-wire voice unbundled port with unbundled port with Caller+E404 ID	LIEPRO	\$2.20	\$135	51.79	\$2.61	\$2.55	\$2.12	\$2.28	\$3.69	\$4.54
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	2-wire voice grade unbundled Alabama extended local dialing parity port with caller ID	UEPAW	\$2.20	NA	NA	AN	NA	NA	AN	AN	NA
	2-wire voice grade unbundled Kentucky extended local dialing parity port with caller ID	UEPBM	AN	NA	NA	\$2.61	AN	AN	AN	NA	NA
-	2-wire voice grade unbundled Louisiana extended local dialing parity port with caller in	UEPAX	AN	AN	AN	NA	\$2.55	NA	NA	NA	NA
	2-wire voice grade unbundled Mississippi extended local dialing parity port with caller ID	UEPAY	AN	NA	NA	NA	NA	\$2.12	NA	NA	NA
<u> </u>	2-wre voice grade unbundled South Carolina extended local dialing parity port with caller in	UEPAZ	AN	NA	AN	NA	AN	NA	NA	\$3.69	NA
1	2-wire voice grade unbundled Tennessee extended local dialing parity port with caller	1 IFPAV	MN	NA	NA	NA	AN	ΨN	AN	NA	\$4.54
1	10 2-wire voice unbrindled incoming only bort with Caller ID	UEPB1	\$2.20	\$1.35	\$1.79	\$2.61	\$2.55	\$2.12	\$2.28	\$3.69	\$4.54
1	2-wire voice unbundled LA Bus Area Calling Port with Caller ID (BUC)	UEPAA	AN	AN	NA	NA	\$2.55	NA	NA	NA	NA
1-	2-wire voice unbundled SC Bus Area Calling Port with Caller ID (LMB)	UEPAB	NA	NA	NA	NA	AN	AN	NA	\$3.69	NA
	2-wire voice unbundled TN Bus 2-Way Area Calling Port Economy Option (TACC1)	UEPAC	NA	NA	NA	NA	NA	AN	NA	NA	\$4.54
	2-wire voice unbundled TN Bus 2-Way Area Calling Port Standard Option (TACC2)	UEPAD	NA	NA	NA	NA	NA	NA	NA	NA	\$4.54
	2-wrre voice unbundled TN Bus 2-WAY Collierville and Memphis Local Caliing Port (B2F)	UEPAE	AN	NA	NA	NA	NA	NA	NA	AN	\$4.54
1	2-Wire Voice Grade Loop (SL1)								07774		NA
	RC - 2- Wire Voice Grade Loop - Statewide	UEPLX	AN	NA	AN B10.00	NA 22120	NA 844.05	C11 EO	\$14.18 MA	NA \$17.03	NA C12 AB
	RC - 2- Wire Voice Grade Loop - Zone 1	UEPLX	\$14.35	\$14.3U	\$10.80	\$14./9	0.416	610.23	VN	\$75,66	\$14.40 \$14.47
	RC - 2- Wire Voice Grade Loop - Zone 2		\$47.24	10.21 25	\$19.83	347.78 \$47.78	\$49.30	\$27.63	AN	\$33.99	\$21.77
	RC - 2- Write Voice Grade Loop - Zone 3 RC - 2- Write Voice Grade Loop - Zone 4	UEPLX	NA	NA	NA	NA	NA	\$36.47	NA	NA	NA
F	Combination Rates										
F	RC - 2-Wire Voice Grade Loop with 2-Wire Line Port, Statewide	Note 8	AA	AN	NA	NA	AN	AN	\$16.46	AN 2222	NA AT 50
	RC - 2-Wire Voice Grade Loop with 2-Wire Line Port, Zone 1 (Note 6)	Note 8	\$16.55	\$16.25	\$12.59	\$17.40	\$16.60	\$16.71 \$21.45	AN N	\$20.71	\$17.UZ
1	RC - 2-Wire Voice Grade Loop with 2-Wire Line Port, Zone 2 (Note 5)	Note 8 Note 8	10.026	\$15.60	\$14.20	\$50.39	\$51.85	\$29.75	AN	\$37.68	\$26.31
1	RC - 2-Wire Voice Grade Loop with 2-Wire Line Fort, Zone 3 (Note 0) RC - 2-Wire Voice Grade Lonn with 2-Wire Line Port Zone 4 (Note 6)	Note 8	AN	NA	NA	NA	NA	\$38.59	NA	AN	NA
1	Nonrecurring Charges										
1	NRC - 2-Wire Voice Grade Loop/Line Port Combination - 1st, Switch as is	USAC2	\$2.80	\$0.1964	\$2.01	\$10.00	\$3.80	\$5.20	\$2.77	\$1.59	\$1.03
11	NRC - 2-Wire Voice Grade Loop/Line Port Combination - Add'l, Switch as is	USAC2	\$0.41	\$0.1964	\$0.3108	\$10.00	\$0.29	\$0.41	\$0.40	\$0.40	\$0.2886
	NRC - 2-Wire Voice Grade Loop/Line Port Combination - 1st, Switch with change	USACC	\$2.80	\$0.1964	\$2.01	\$10.00	\$3.80	\$5.20	\$2.77	\$1.59	\$1.03
	NRC - 2-Wire Voice Grade Loop/Line Port Combination - Add'l, Switch with change	USACC	\$0.41	\$0.1964	\$0.3108	\$10.00	\$0.29	\$0.41	\$0.40	\$0.40	\$0.2886 \$10.00
	NRC - 2-Wire Voice Grade Loop/Line Port Combination - Subsequent	USAS2	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	910.00
	NRC - 2-Wire Voice Grade Loop/Line Port Combination - OSS LSR Charge, Electronic, per LSR received from the CLEC by one of the OSS interactive interfaces		c L c	4 4 9	40 40	03 EV	¢3 60	¢3 £0	¢3 50	23 EU	\$3 50
_	(Note 7)	SOMEC	00.53	c/.7¢	93.50	93.50	00.0¢	00.00	90.00	90.00	00.00
	NRC - 2-Wire Vorce Grade Loop/Line Port Combination - Incremental Cost - Manual Svc.Order vs. Electronic - 1st	SOMAN	\$40.71	\$21.56	\$33.67	\$19.99	\$31.92	\$43.52	\$40.18	\$43.19	\$30.89
	NRC - 2-Wire Voice Grade Loop/Line Port Combination - Incremental Cost - Manual Svc. Order vs. Electronic - Add'	SOMAN	\$9.58	\$21.56	\$7.88	\$19.99	\$7.32	\$9.99	\$9.45	\$9.91	\$7.03
	NRC- 2 Wire Voice Grade Loop/Line Port Combination - Subsequent Database		\$1.44	TBD	TBD	TBD	\$2.11	\$2.87	\$1.42	\$0.71	\$0.76
	Network Structure Structure Complete Network State Structure Struc		\$8.25	TBD	TBD	TBD	\$5.12	\$6.88	\$10.27	\$8.91	\$7.97
1	NRC - Electronic Service Order Disconnect		AN	\$0.42	NA	NA	NA	AN	AN	AN	NA
E	NRC - Incremental Manual Service Order Disconnect		\$20.00	\$3.84	\$20.00	\$20.00	\$20.00	\$20.00	\$20.00	\$20.00	\$20.00

Version 3Q00:10/25/00



+

 BILL NO
 502 Q95-0628 628

 INVOICE NO
 502Q950628-07359

 BILL DATE
 DEC 25,2007

 OCN 9289
 PAGE 21

* * * DETAIL OF OTHER CHARGES AND CREDITS * * *







Bell South UNE and UNEP Cost Analysis

Average Cost Analysis

Cost per

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Trending of Average Cost/Line

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Total		1,084,907.97	25,662	\$	42.28
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UNEP Service Order					
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Manual SOMAN	69	130,169.46	16561	θ	7.86
UNEP Misc	\$	198.22			
Total Non-Recurring Charge	\$	320,225.43			
Fractional Charge	\$	292,392.52			
OCC Adjustments					
UNE Loop Service Calls	\$	720.00			
UNEP Service Calls	ŝ	13,330.00			
Total OCC	\$	626,667.95			
LPC and Taxes					
Total Invoice	\$	\$ 1,711,575.92	25,662	ŝ	66.70

Proprietary. Duplication or redistribution prohibited without permission.



or premises, a cell site, Mobile Switching Center or base station, do not constitute local Loops under Section 251, except to the extent that SouthEast may require Loops to such locations for the purpose of providing telecommunications services to its personnel at those locations.

- 1.4.4 <u>Conversion of Wholesale Services to Network Elements or Network Elements to</u> <u>Wholesale Services</u>
- 1.4.4.1 Upon request, AT&T shall convert a wholesale service, or group of wholesale services, to the equivalent Network Element or Combination that is available to SouthEast pursuant to this Agreement, or convert a Network Element or Combination that is available to SouthEast under this Agreement to an equivalent wholesale service or group of wholesale services offered by AT&T (collectively "Conversion"). AT&T shall charge the applicable nonrecurring switch-as-is rates for Conversions to specific Network Elements or Combinations found in Exhibit 1 of Attachment 2. AT&T shall also charge the same nonrecurring switch-as-is rates when converting from Network Elements or Combinations. Any rate change resulting from the Conversion will be effective as of the next billing cycle following AT&T's receipt of a complete and accurate Conversion request from SouthEast. A Conversion shall be considered termination for purposes of any volume and/or term commitments and/or grandfathered status between SouthEast and AT&T. Any change from a wholesale service/group of wholesale services to a Network Element/Combination, or from a Network Element/Combination to a wholesale service/group of wholesale services that requires a physical rearrangement will not be considered to be a Conversion for purposes of this Agreement. AT&T will not require physical rearrangements if the Conversion can be completed through record changes only. Orders for Conversions will be handled in accordance with the guidelines set forth in the Ordering Guidelines and Processes and CLEC Information Packages.
- 1.4.4.2 Any outstanding conversions shall be effective on or after the effective date of this Agreement.
- 1.5 AT&T shall comply with the requirements as set forth in the technical references within Attachment 2 to the extent that they are consistent with the greater of AT&T's actual performance or applicable industry standards.
- 1.6 <u>Procedures for Additional Designations of "Non-Impaired" Wire Centers.</u>
- 1.6.1 If AT&T seeks to designate additional wire centers as "non-impaired" for purposes of the FCC's Triennial Review Remand Order (<u>TRRO</u>), AT&T shall file with the Commission a proposed list of any new "non-impaired" wire centers on April 1 of each year (coincident with its filing of ARMIS 43-08 data with the FCC). The list of additional "non-impaired" wire centers filed by AT&T will reflect the number of Business Lines and fiber-based collocators, as of December 31 of the previous year, in each wire center that AT&T proposes be considered "non-impaired."



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Mit Party Control Link Discrimination Discrimination <thdiscrimination<< td=""><td></td><td>per DS1</td><td>_</td><td>UTTD3, ULDD3,</td><td></td><td></td><td>205 70</td><td>7.20</td><td>0.6924</td><td>0.00</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></thdiscrimination<<>		per DS1	_	UTTD3, ULDD3,			205 70	7.20	0.6924	0.00							
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Construction DNC/M DVC/M DVC/M DVC/M Cold		DS1/DS0 Channel System	+	UNC3X, UNCSX	MQ3	158.20	115.48	56.53	15.12	5.30		T					
re: Grate COCI - IF 2WSL 3. 4th Vote Grate LearLiele Leb. DVIC DVICe DEAD EP1 484 Version Front 2010, COCI 12 2MSL 1. 4th Vote Grate LearLiele DVIC DVICe DVICe DVICe DVICe DVICe DVICe DVICe DVICe 0.484 444 444 DVID COCI 21 24 25 45 11. Control and anomalication DVICe DVICe DVICe DVICe DVICe 212 E17 444 444 DVID COCI 21 24 25 45 11. Control and anomaliant DVICe DVICe DVICe 214 E17 444 </td <td></td> <td>Voice Grade COCI in combination</td> <td></td> <td>UNCVX</td> <td>1D1VG</td> <td>0.6228</td> <td>6.71</td> <td>4.84</td> <td>T</td> <td></td> <td></td> <td></td> <td>T</td> <td></td> <td></td> <td></td> <td></td>		Voice Grade COCI in combination		UNCVX	1D1VG	0.6228	6.71	4.84	T				T				
Construction Construction<		Vience Crocks Corce - for 2W-SI 2 & 4W Voice Grade Local Loop		UEA	1D1VG	0.6228	6.71	4.84									
Other Conf 12, at each in the arm sort of a display (and a contract of the arm sort of the arm sort of a display (and a contract of the arm sort of the		Voice Grade COCI - for connection to a channelized DS1 Local	╞				r c	10 1									
CUDP COD (2 4464ba) In connention DCM DDD COD (2 4464ba) In connention 444 CUDP COD (2 4464ba) In connention UTUD DDD COD (2 4464ba) In connention 484 CUDP COD (2 4464ba) In connention UTUD DDD COD (2 4464ba) In connention 484 CUDP COD (2 4464ba) In connention UTUD DDC CD 244 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 244 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 244 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 244 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 244 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 144 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 144 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 144 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 144 484 CUDP COD (2 4464ba) In connention UTUD UDC CD 144		Channel in the same SWC as collocation		UITUC	101/06	0.6228	6.71	4.84									
CULC No. Line Line <thline< thr=""> Line Line</thline<>		OCU-DP COCI (2.4-64kbs) in combination	+	UDL	10100	1.32	6.71	4.84									
Constraint District Distrit District District		OCULDP COCI (2.4-64Kbs) - for unoundeu urginal coup OCILDP COCI (2.4-64Kbs) - for connection to a channelized DS1	-														
Mark Start Deck UCICA 2.84 0.11 4.81 Anno Silva Coll (BHTE), for a chardleon UN COL 2.84 0.11 4.81 Coll for the Sime Silva Coll (BHTE), for a chardleon UN COL 2.84 0.11 4.81 Coll for the Sime Silva Coll (BHTE), for a chardleon UN COL 1.11.80 6.11 4.84 Coll for the Sime Silva Coll (BHTE), for a chardleon Silva Coll (BHTE), for a		Local Channel in the same SWC as collocation		UITUD	10100	1.32	6.71	4.84				T					
Water SDN COCI (Filt): For a classified of 2001) UTLB UCCIC 2.84 6.17 6.44 9.44 and Charrent in the amenication of activitient of a classified of 2001 UTDB UCCIC 2.84 6.17 4.44 1.44 and Charrent in the amenication of activitient of a classified charrent UTDB UCCID 11.38 6.17 4.44 1.44 and Charrent in the amenication of a classified charrent UTDB UCDD UCDD 11.38 6.17 4.44 1.44 and Charrent in the amenication of a classified charrent UTDB UCDD UCDD 11.38 6.17 4.44 1.44 and Charrent in the contention of antimication of structure charrent of the contention of		2-wire (SDN COCI (BRITE) in combination	+	UNCNX	UCICA	2.84	6 71	4.64									
Million Units UCCA 2.84 6.71 4.84 1 and Christen NC Coll free Stand Active 0.071X UCCD1 11.80 6.71 4.84 1 ST COCI in commentation 0.071X UCCD1 11.80 6.71 4.84 1 ST COCI in commentation 0.071X UCCD1 11.80 6.71 4.84 1 ST COCI in commentation 0.071X UCCD1 11.80 6.71 4.84 1 ST COCI in commentation of atomic data frame 0.071X UCCD1 11.80 6.71 4.84 1 ST COCI in commentation of atomic data frame 0.071X UCCD3 UCCD1 11.80 6.71 4.84 1 ST COCI in commentation of atomic data frame 0.071X UCCD3 UCCD3 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84 1 4.84		2-wire ISDN COCI (BRITE) - for a Local Loop	+	NIN	20100	10.7											
Answerstein UNCI UCIDI 11.80 6.11 4.84 ST COLT rementation UNDI UCIDI 11.90 6.11 4.84 ST COLT rementation UNDI UCIDI 11.90 6.11 4.84 ST COLT registrat Advect Lead Charmed In UTL UNDI UCIDI 11.80 6.11 4.84 ST COLT registrat Advect NEX.X UNCXX, UNCXX, UNCXX UNCIDI 11.80 6.11 4.84 ST COLT registrated for a channelland DST Lead Charmed In UTX, INCXX, UNCXX, UNCXX, UNCXX 856 8.96 8.96 8.96 Annual Advector NEX.X UNCXX, UNCYX, UNCXX, UNCXX, UNCYX, UNCXX,		2-wire ISDN COCI (BRITE) - for connection to a charatelized UST		UITUB	UCICA	2.84	6.71	4.84									
ST COC1 FST Start UDD1 UCD1 T1.80 E.71 4.84 ST COC1 FE Start Algoen interolled Channel UTD1 UCD1 T1.80 E.71 4.84 ST COC1 FE Start Algoen interolled Channel UTD1 UCD1 T1.80 E.71 4.84 ST COC1 FE Start Algoen interolled Channel UTD3 UCD1 T1.80 E.71 4.84 ST COC1 FE starterstein to a channelland DS1 Local Channel Nexcix, Uxcxx,		IDS1 COCI in combination		UNC1X	UC1D1	11.80	6.71	4.84									
St. COG1 - for SST Local Users USL INTOT UCIUI 11.80 6.71 4.64 ST COG1 - for SST Lead Users ST COG1 - for SST Lead Users UNCXX, UNCX		DS1 COCI - for Stand Alone Local Channel		ULDD1	UC1D1	11.80	6.71	4,84									
NOD: Local Charred in strong: UTUA: UCIDI 11.80 6.71 4.84 4 Strong: NOD: VEXX, VEXX, VEXX, VEX		DS1 COCI - for Stand Alone Interoffice Channel	-	UTUT UTUT	UC1D1	11.80	6.71	4.84									
B same SVC as othologian UTUAD UCIDI 11.00 6.11 4.84 B same SVC as othologian UNCX, XDEX, XDUEX, XD		DS1 COCI - for DS1 Local Loop	╀							_							
Moleasile - UNE: Switch-As-Is Conversion Charge UNKCX, UNCX, UNCX, UNCX, UNCX, UNCX, UNCX, UNCX, UNCX, UNTX, UNXX, UNXY, UNXX, UNXX, UNXX, UNXX, UNXY, UNXX, U		UST COCI - for contrection to a chainmane of the same SWC as collocation		UITUA		11.80	6.71	4.84									
Nonesterior UNCKX UDCXX NUCC 8:98 8:98 8:98 Molesatie - UNE_Switch-As-is Conversion Charge XDD2X YDD2X<				UNCVX, UNCDX, UNC1X, UNC3X,													
Wolessie - UNE, Switch-Ar-Is Connerson Charge XODXX, XDVXX, MUCC 8,98 6,58 Modessie - UNE, Switch-Ar-Is Connerson Charge YERST, UNDXX, MUCC 8,98 6,59 6,10 Murdled Mice Rate Element, SNE SA, Single Network Element, in UTTX, UTDX, MULX, SMER, UTTX, UTDX, MULX, SMER, MUCC 8,98 6,59 6,10 Murdled Mice Rate Element, SNE SA, Single Network Element, in UTTX, UTDX, MULX, SMER, MULX, MULX, SMER, MULX, MULX, SMER, MULX, MULX, MULX, SMER, MULX,				UNCSX, UDFCX,													
Molesele - URE, Switch-Aris Conversion Charge XCOFX, XDDAX, Molesele - URE, Switch-Aris Conversion Charge KODEX, Molesele - URE, Switch-Aris Conversion Charge KODEX Molecc 8.9.8 9.9.8 9.9.8 9.9.9				XDH1X, HF-UC6, XDD2X, XDV6X,													
Wnelessie - UKE: Switch-Asis Commission Charge IFFRS1: UNX-WIDS UnrUC USS UnrUC USS USS <thuss< th=""> USS USS</thuss<>				XDDFX, XDD4X,			80 8	R QR									
Mundled Micr Rate Element, SNE SAI, Single Network Element, Furth V. UTDX, VITDX, VI		Wholesale - UNE, Switch-As-Is Conversion Charge	_	HERST UNCNX			0.30	00.0									
Much Als Is ben-recting Carago, nor contact Landon Mark Service Element - UITYS, UITDS, and the factor (Landon Mark Service) Carago and Carago, nor contact Landon Mark Service Service (Landon Mark Service) Carago and Carago, nor contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS1, UP; UES URESP 1133 and contact and charago per creat i UITS2, UTUS, URESP 1133 and contact and charago and charago per creat i UTTC, UTUS, UTUS, UTUS, UTUS, URESP 1133 and contact and charago		Unbundled Misc Rate Element, SNE SAI, Single Network Element -		UITO1, UITO3.			36.80	16.10									
Markin Mark Markermering Charge per cricit i UITS1, UDF: UESP 11-9 11-9 11-9 11-9 11-9 11-9 11-9 11-		Switch As Is Non-recurring Charge, per circuit (LSK)	-	UITVX, UITDX,	T-												
na seriedineti. Di CGS - Customer Reconfiguration (FiexGerv) 2010 - - Configuration (FiexGerv) 2010 - Customer Reconfiguration (FiexGerv) 2010 - Configuration (FiexGerv) 2010 - Customer Reconfiguration (FiexGerv) 2010 - Customer		Unburked misc rate dottent, one only ungo rate of Switch As Is Non-recurring Charge, incremental charge per circuit		U1TD1, U1TD3,			1 49	67									
olds: Customer Recent/ isolation i.i.s3 i.i.i.s3 i.i.s3 i.i.s3 <td></td> <td>on a spreadsheet</td> <td>_</td> <td>U1131, UUF, UC3</td> <td>LCBLD</td> <td></td> <td>2.1</td> <td></td>		on a spreadsheet	_	U1131, UUF, UC3	LCBLD		2.1										
SS 1055 Termention with DSI Switching	Acce	ss to DCS - Customer Recontiguration (FlexServ)	-	_					2.03								
SE DCS Termination with DS1 Switching 15.20 2.2.01 2.3.16 21.06 SE DCS Termination with DS1 Switching 15.20 3.2.81 23.16 21.06 SED SDS Termination with DS1 Switching 14.20 3.2.81 23.16 21.06 State per month UNCHT 17.69 3.2.81 23.06 21.06 Vale per month UNCHT 17.69 3.2.91 23.06 21.06 KeC - Change in Facility Assignment per cricit Services UTDX, UNCX, UTDX, UNCX, URETD 101.09 43.04 Rich - Change in Facility Assignment per cricit Services UNCX, UNCX, URETD 101.09 43.04 MRC - Change in Facility Assignment per cricit Project UNCX, UNCX, URETD 101.09 43.04 MRC - Change in Facility Assignment per cricit Project UNCX, UNCX, URETD 3.67 3.67 MRC - Change in Facility Assignment per cricit Project UNCX, UNCX, URETD 3.67 3.67 MRC - Change in Facility Assignment per cricit Project UNCX, UNCX, URETD 3.67 3.67 MRC - Change in Facility Assignment per cricit Project UNCX, UNCX, URETD 3.67 3.67		DS1 DCS Termination with DS0 Switching				25.69		23.58	21.09								
Disc DGS fermantion with DS1 Switching methoded web etr month Rearrangements WEC - Change in Facility Assignment per circuit Service MEC - Change in Facility Assignment per circuit Service WITUS, UNCU, UITUS, UITUS, UNCU, WEC - Change in Facility Assignment per circuit Service UITUS, UNCU, UNTUS, WEC - Change in Facility Assignment per circuit Service WITUS, UNCU, UITUS, WEC - Change in Facility Assignment per circuit Propect Management (added to CFA per circuit fropect marvaged) I UNCUX, UNCUX, UNETID UITUS, UNCUX, UITUS, UNCUX, UNCUX, UNETID UITUS, UNCUX, UNCUX, UNCUX, UNCUX, UNETID I UNCUX, UNCU		DS1 DCS Termination with DS1 Switching	_			12.41		23.58	21.09								
Instruction UNCMT 17.69 Add per month UTTVX, UTDXX, UTTVX, UTDXX, Rearrangements UTDX, UTDX, UTDX, UTDX, UDVX, UTDX, UNCVX, UTDX, UTDX, UNCVX, UTDX, UNCVX, UNCVX, UTDX, UNCVX, UNCVX, UTDX, UNCVX, UNCVX, UTDX, UNCVX, UNCVX, UNCVX, UTDX, UNCVX,		DS3 DCS Termination with DS1 Switching	-			12.101											
Net of the second secon	Pool	(SynchroNet)		UNCDX	UNCNT	17.69											
Mitro: UTTOC: UTOC:	2 aS	ce Bearrangements															
NRC - Change in Facility Assignment per critical Service UTTB, ULDVX, NRC - Change in Facility Assignment per critical Service ULDVX, UNCTXX, UNCTXX, UNCTXX, UNCTXX, URETD 101.09 UTTD, ULDVX, UNCTXX, UNCTX, URETD 101.09 UTTD, ULDVX, UNCXX, URETD 3.67 Management (added to CFA per critical Fronject managed) 1 UNCDX, UNCTX, URETB 3.67 Management (added to CFA per critical Fronject managed) 1 UNCDX, UNCTX, URETB 3.67 Maragement (added to CFA per critical Fronject managed) 1 UNCDX, UNCTX, URETB 3.67 Maragement (added to CFA per critical Fronject managed) 1 UNCTX, UNCTX, URETB 3.67	5			UITVX, UITDX,													
MFC - Change in Facility Assignment per cricit Service LUCDX, LNCTX URETD 101.09 Rearrangement UTTXX, UTTDX UTTXX, UTTDX 101.09 101.09 Rearrangement UTTXX, UTTDX UTTDX, UTTDX 101.09 101.09 Rearrangement UTTXX, UTTDX UTTXX, UTTDX 101.09 101.09 RRC - Change in Facility Assignment per circuit Project UTDXX, UNCXX, UNCXX URETB 3.67 Mangement (added to CFA per circuit froject managed) 1 UNCXX, UNCXX URETB 3.67 MRC - Oration Specific Time - Decicated Transport 1 UNCXX, UNC3X OCOSR 18.87				UITUB, ULDVX,													
Rearrangement Net C. Change n Facility Assignment Per circuit Project NEC - Change n Facility Assignment Per circuit Project Mangement (added to CFA per circuit froject managed) NEC - Order Coordination Specific Time - Dedicated Transport NEC - Order Coordination Specific Time - Dedicated Transport NEC - Order Coordination Specific Time - Dedicated Transport		NRC - Change in Facility Assignment per circuit Service		ULDDX, UNCVX,			101 00	PU 5P									
NRC - Change in Facility Assignment per circuil Project Management (added to CFA per circuil Project NRC - Order Coordination Specific Time - Dedicated Transpect NRC - Order Coordination Specific Time - Dedicated Transpect 1 UNCDX UNC3X OCOSR 18.67		Rearrangement	_	UNCUX, UNCIX	Т												
NRC - Change in Facility Assignment per circuit Project ULDDX. UNCVX, ULDDX. UNCVX, Management (added to CFA per circuit froject managed) 3.67 3.67 NRC - Order Coordination Specific Time - Dedicated Transport 1 UNCUX, UNC3X OCOSR 18.87				UTTUC, UTTUD,													
Management (added to CFA per circul if project managed) 1 UNEUX. UNC3X UNC3X OCOSR 18.87 INIC - Order Coordination Specific Time - Dedicated Transport 1 UNC1X, UNC3X OCOSR 18.87		NRC - Change in Facility Assignment per circuit Project		ULDDX, UNCVX,			3.67	3.67									
		Management (added to CFA per circuit if project managed)		UNCUX, UNC3X			18.87	18.87									
	ISNIMU S		╞							_		_	-	-			