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January 17, 2006

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

Re: Petition to Establish Generic Docket to Consider Amendments to
Interconnection Agreements Resulting from Changes of Law
KPSC 2004-00427

Dear Ms. O'Donnell:

BellSouth encloses for this Commission's information the December 15, 2005, decision of the District of Columbia Public Service Commission. BellSouth provides this decision as supplemental authority for its positions and requests the Commission take administrative notice of same. In relevant part, the District of Columbia held that:

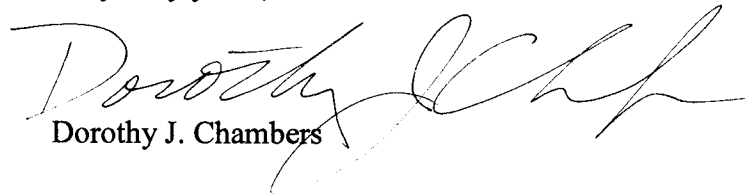
- There is no requirement that section 271 network elements be addressed in interconnection agreements negotiated and arbitrated pursuant to section 252 and a state commission's authority does not extend to requiring inclusion of section 271 network elements in interconnection agreements (pp. 28-29, n. 173);
- Conversion and commingling rules must be implemented in interconnection agreements and cannot become effective until the date that the amendments are executed (p. 16);
- The FCC's fiber to the home and fiber to the curb rules are not limited to residential customers but may also apply to enterprise customers (p. 19);
- The FCC's definition of business lines includes all UNE loops attached to a wire center, without restricting the loops to business loops. (p. 30).

One paper copy of this filing is provided for filing in this case. The attached certification for case 2004-00427 certifies that this filing was filed electronically today and served by email

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on parties of record. Parties of record can access the information at the Commission's Electronic Filing Center located at <http://psc.ky.gov/efs/efsmain.aspx>.

Very truly yours,



Dorothy J. Chambers

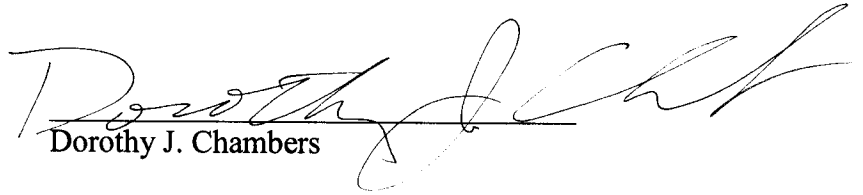
Enclosure

cc: Parties of record

617221

CERTIFICATION FOR 2004-00427

I hereby certify that the electronic version of this filing made with the Commission this 17th day of January 2006 is a true and accurate copy of the documents filed herewith in paper form on January 17, 2006, and the electronic version of the filing has been transmitted to the Commission. An electronic copy of the Read1st document has been served electronically on parties.


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ELECTRONIC SERVICE LIST - KPSC 2004-00427

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