



BellSouth Interconnection Services

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Sent via Electronic and Certified Mail

February 15, 2006

Mr. David L. Sieradzki
Counsel for SouthEast Telephone, Inc.
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004-1109

Re: Unbundled Network Element Platform Transition

Dear Mr. Sieradzki:

This is in response to your letter dated February 7, 2006, to John Hamman regarding SouthEast's plan to not transition its remaining embedded base of stand-alone switch ports and Unbundled Network Element Platform (UNE-P) lines to alternative arrangements. In this context, the term "embedded base" refers to the stand-alone switch ports and UNE-Ps that SouthEast had in-service prior to April 27, 2005. On April 27, 2005, BellSouth ceased accepting new service requests from CLECs for mass market unbundled local switching and UNE-P in the state of Kentucky, as explained in Carrier Notification Letter SN91085094 posted on April 26, 2005.

BellSouth maintains its position that SouthEast has a legal obligation to cooperatively work with BellSouth to transition its embedded base of stand-alone switch ports and UNE-Ps to alternative arrangements during the timeframe established by the FCC's Triennial Review Remand Order (TRRO). BellSouth realizes that the issue of transition of such embedded base is being litigated in the change of law docket currently pending before the Kentucky Public Service Commission and will be resolved in that forum. However, the issues regarding the lines that SouthEast has ordered as resale on and after April 27, 2005, are not identical to the issues regarding the orderly transition of the embedded base, as you claim, and the "resale" issues will be resolved in the separate proceeding between BellSouth and SouthEast. As such, BellSouth's plan is to continue to diligently pursue its rights before the Kentucky Public Service Commission, and a "stand still" agreement, as suggested by SouthEast, is not appropriate. Indeed, SouthEast is the only CLEC in BellSouth's region that has blatantly attempted an end run around the April 22, 2005 "no new adds" order from the U. S. District Court for the Eastern District of Kentucky by ordering resold lines and refusing to pay for such.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alessandra Richmond".

Alessandra Richmond
Manager - Interconnection Services

cc: Darrell Maynard
John Hamman

