

SouthEast Telephone

April 2, 2009

Via UPS Overnight

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

RECEIVED

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PUBLIC SERVICE
COMMISSION

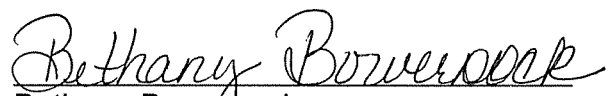
Re: SouthEast Telephone, Inc., Complainant v. BellSouthTelecommunications, Inc. d/b/a AT&T
Kentucky, Defendant
Case No. 2008-00279

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,



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
COMMISSION STAFF

FILED: APRIL 3, 2009

SOUTHEAST TELEPHONE, INC.

**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.

SOUTHEAST TELEPHONE, INC.

**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.

Moreover, 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

SOUTHEAST TELEPHONE, INC.

**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.

SOUTHEAST TELEPHONE, INC.

**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)?

A.-3. SouthEast does not agree that every single location it serves is capable of being served by an unbundled copper loop non-designed; however, the unbundled copper loop non-designed is not the only element AT&T is required to commingle at SouthEast's request. AT&T stated in its 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

SOUTHEAST TELEPHONE, INC.

**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.

SOUTHEAST TELEPHONE, INC.

**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).

SOUTHEAST TELEPHONE, INC.

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

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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.



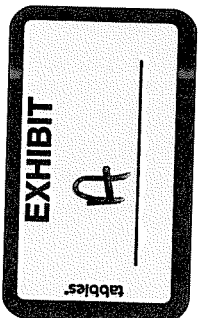
Carla Reichelderfer, COO/CFO

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



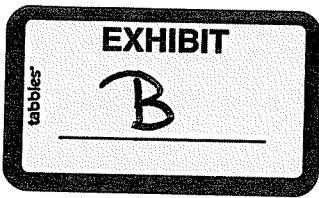
NOTARY PUBLIC, STATE AT LARGE

My commission expires 4-21-12.



BELLSOUTHSouthEast RATES
NETWORK ELEMENTS
AND OTHER SERVICES
LOOP/PORT COMBINATIONS

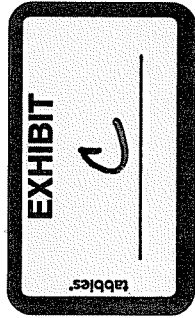
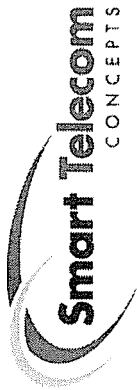
| DESCRIPTION | USOC | AL | FL | GA | KY | LA | MS | NC | SC | TN |
|--|--------|---------|----------|----------|---------|---------|---------|---------|---------|----------|
| 2-wire voice unbundled res, low usage line port with Caller ID (LUM) | UEPAP | \$2.20 | \$1.35 | \$1.79 | \$2.61 | \$2.55 | \$2.12 | \$2.28 | \$3.69 | \$4.54 |
| 2-Wire Voice Grade Line Port (Bus.), per month | | | | | | | | | | |
| 2-wire voice unbundled port without Caller ID | UEPBL | \$2.20 | \$1.35 | \$1.79 | \$2.61 | \$2.55 | \$2.12 | \$2.28 | \$3.69 | \$4.54 |
| 2-wire voice unbundled port with unbundled port with Caller+E484 ID | UEPBC | \$2.20 | \$1.35 | \$1.79 | \$2.61 | \$2.55 | \$2.12 | \$2.28 | \$3.69 | \$4.54 |
| 2-wire voice unbundled outgoing only port. | UEPBO | \$2.20 | \$1.35 | \$1.79 | \$2.61 | \$2.55 | \$2.12 | \$2.28 | \$3.69 | \$4.54 |
| 2-wire voice grade unbundled Alabama extended local dialing parity port with caller ID | UEPAW | \$2.20 | NA | NA | NA | NA | NA | NA | NA | NA |
| 2-wire voice grade unbundled Kentucky extended local dialing parity port with caller ID | UEPBM | NA | NA | NA | \$2.61 | NA | NA | NA | NA | NA |
| 2-wire voice grade unbundled Louisiana extended local dialing parity port with caller ID | UEPAX | NA | NA | NA | NA | \$2.55 | NA | NA | NA | NA |
| 2-wire voice grade unbundled Mississippi extended local dialing parity port with caller ID | UEPAY | NA | NA | NA | NA | NA | \$2.12 | NA | NA | NA |
| 2-wire voice grade unbundled South Carolina extended local dialing parity port with caller ID | UEPAZ | NA | NA | NA | NA | NA | NA | NA | \$3.69 | NA |
| 2-wire voice grade unbundled Tennessee extended local dialing parity port with caller ID | UEPAV | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| 2-wire voice unbundled incoming only port with Caller ID | UEPBI | \$2.20 | \$1.35 | \$1.79 | \$2.61 | \$2.55 | \$2.12 | \$2.28 | \$3.69 | \$4.54 |
| 2-wire voice unbundled LA Bus Area Calling Port with Caller ID (BUC) | UEPAA | NA | NA | NA | NA | \$2.55 | NA | NA | NA | NA |
| 2-wire voice unbundled SC Bus Area Calling Port with Caller ID (LMB) | UEPAB | NA | NA | NA | NA | NA | NA | NA | \$3.69 | NA |
| 2-wire voice unbundled TN Bus 2-Way Area Calling Port Economy Option (TACC1) | UEPAC | NA | NA | NA | NA | NA | NA | 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-wire voice unbundled TN Bus 2-WAY Collierville and Memphis Local Calling Port (BZF) | UEPAE | NA | NA | NA | NA | NA | NA | NA | NA | \$4.54 |
| 2-Wire Voice Grade Loop (SL1) | | | | | | | | | | |
| RC - 2-Wire Voice Grade Loop - Statewide | UEPLX | NA | NA | NA | NA | NA | NA | \$14.18 | NA | NA |
| RC - 2-Wire Voice Grade Loop - Zone 1 | UEPLX | \$14.35 | \$14.90 | \$10.80 | \$14.79 | \$14.05 | \$14.69 | NA | \$17.02 | \$12.48 |
| RC - 2-Wire Voice Grade Loop - Zone 2 | UEPLX | \$23.31 | \$18.51 | \$12.47 | \$27.68 | \$24.14 | \$19.33 | NA | \$25.66 | \$14.42 |
| RC - 2-Wire Voice Grade Loop - Zone 3 | UEPLX | \$42.24 | \$24.25 | \$19.83 | \$47.78 | \$49.30 | \$33.99 | NA | \$33.99 | \$21.77 |
| RC - 2-Wire Voice Grade Loop - Zone 4 | UEPLX | NA | NA | NA | NA | NA | \$36.47 | NA | NA | NA |
| Combination Rates | | | | | | | | | | |
| RC - 2-Wire Voice Grade Loop with 2-Wire Line Port, Statewide | Note 8 | NA | NA | NA | NA | NA | NA | \$16.46 | NA | NA |
| 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 | NA | \$20.71 | \$17.02 |
| RC - 2-Wire Voice Grade Loop with 2-Wire Line Port, Zone 2 (Note 6) | Note 8 | \$25.51 | \$19.86 | \$14.26 | \$30.29 | \$26.69 | \$21.45 | NA | \$29.35 | \$18.96 |
| RC - 2-Wire Voice Grade Loop with 2-Wire Line Port, Zone 3 (Note 6) | Note 8 | \$44.44 | \$25.60 | \$21.62 | \$50.39 | \$51.85 | \$29.75 | NA | \$37.68 | \$26.31 |
| RC - 2-Wire Voice Grade Loop with 2-Wire Line Port, Zone 4 (Note 6) | Note 8 | NA | NA | NA | NA | NA | \$38.59 | NA | NA | NA |
| Nonrecurring Charges | | | | | | | | | | |
| 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 |
| 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 |
| 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 | \$10.00 |
| 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 (Note 7) | SOMECC | \$3.50 | \$2.75 | \$3.50 | \$3.50 | \$3.50 | \$3.50 | \$3.50 | \$3.50 | \$3.50 |
| NRC - 2-Wire Voice 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'l | 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 Update - Electronic | | \$1.44 | TBD | TBD | TBD | \$2.11 | \$2.87 | \$1.42 | \$0.71 | \$0.76 |
| NRC - 2-Wire Voice Grade Loop/Line Port Combination - Subsequent Database Update - Manual Service Order | | \$8.25 | TBD | TBD | TBD | \$5.12 | \$6.88 | \$10.27 | \$8.91 | \$7.97 |
| NRC - Incremental Service Order Disconnect | | NA | \$0.42 | NA | NA | NA | NA | NA | NA | NA |
| NRC - Incremental Manual Service Order Disconnect | | \$20.00 | \$3.84 | \$20.00 | \$20.00 | \$20.00 | \$20.00 | \$20.00 | \$20.00 | \$20.00 |



BILL NO 502 095-0628 628
 INVOICE NO 5020950628-07359
 BILL DATE DEC 25,2007
 OCN 9289 PAGE 21

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

| | BIP | AMOUNT |
|--|-------|--------|
| | ----- | ----- |
| + TELEPHONE NUMBER WTN6065739739EARNING TN6065739739 (CONT'D) | | |
| CHARGE FOR SERVICE ADDED | | |
| FROM NOV 28 07 THRU DEC 24 07 | | |
| UEPLX 1 Unbundled Loop Voice Grade | | |
| LOCAL - KY - EC 5182 - ZONE 3 | | 27.53 |
| CHARGE FOR SERVICE ADDED | | |
| FROM NOV 28 07 THRU DEC 24 07 | | |
| NXMCR 1 Caller ID Name-Number Delivery Anonymous Call | | |
| Blocking | | |
| LOCAL - KY - EC 5182 | | 1.90 |
| INITIAL ONE TIME CHARGE | | |
| USACC 1 Unbundled Network Element 2W Conversion Change | | |
| LOCAL - KY - EC 5182 | | 10.00 |
| INITIAL ONE TIME CHARGE | | |
| SOMEK 1 CLEC Service Req Processing per Mechanized LSR | | |
| LOCAL - KY - EC 5182 | | 3.50 |
| NET EFFECT OF SO C417C7N2 PON 463494 | | |
| PER MONTH FRACTIONAL ONE-TIME BILLED AMOUNT | | |
| TOTAL - KY - EC 5182 | | |
| 0.00 36.77 13.50 | | 50.27 |
| NOV 27 07 SO C43PQXC0 PON 463463 | | |
| OCL LOCATION JCSNKYMADS0 | | |
| TELEPHONE NUMBER WTN6066668901EARNING TN6066668901 | | |
| CHARGE FOR SERVICE ADDED | | |
| FROM NOV 28 07 THRU DEC 24 07 | | |
| UEPRM 1 Unbundled Exchange Port-2W KY Area Plus w/ Caller ID Cap | | |
| LOCAL - KY - EC 5182 | | 7.34 |
| CHARGE FOR SERVICE ADDED | | |
| FROM NOV 28 07 THRU DEC 24 07 | | |
| UEPLX 1 Unbundled Loop Voice Grade | | |
| LOCAL - KY - EC 5182 - ZONE 3 | | 27.53 |
| CHARGE FOR SERVICE ADDED | | |
| FROM NOV 28 07 THRU DEC 24 07 | | |
| NXMCR 1 Caller ID Name-Number Delivery Anonymous Call | | |
| Blocking | | |
| LOCAL - KY - EC 5182 | | 1.90 |
| INITIAL ONE TIME CHARGE | | |
| USACC 1 Unbundled Network Element 2W Conversion Change | | |
| LOCAL - KY - EC 5182 | | 10.00 |

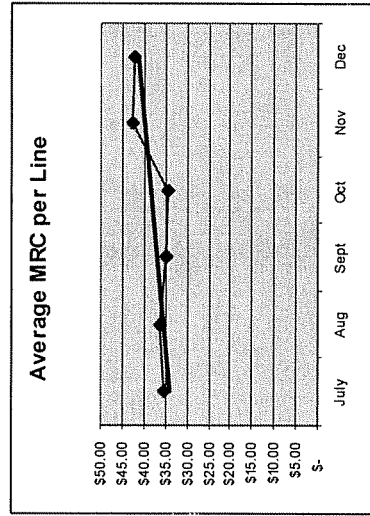


Bell South UNE and UNEP Cost Analysis

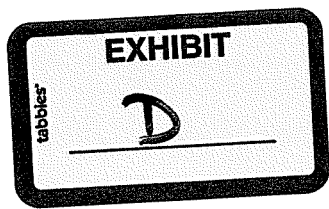
- Average Cost Analysis
 - Trending of Average Cost/Line

| Month | Line | Usage | ADUF/OD | UF | Total |
|-------|------|----------|---------|------|----------|
| July | | \$ 27.95 | \$ 6.88 | 1.05 | \$ 35.40 |
| Aug | | \$ 28.30 | \$ 7.20 | 1.14 | \$ 36.11 |
| Sept | | \$ 27.83 | \$ 6.65 | 1.12 | \$ 35.01 |
| Oct | | \$ 27.47 | \$ 6.48 | 0.97 | \$ 34.20 |
| Nov | | \$ 35.74 | \$ 6.84 | 1.12 | \$ 42.87 |
| Dec | | \$ 37.29 | \$ 4.44 | 0.74 | \$ 42.28 |

9riaPo



| Kentucky | | | |
|-----------------------------------|------------------------|-----------------|-----------------|
| Monthly Recurring Charge | Total Cost | Number of Lines | Cost per Line |
| UNEP Loop | \$ 946,897.31 | 24,718 | \$ 38.31 |
| UNE Loop | \$ 10,067.23 | 944 | \$ 10.66 |
| Usage | \$ 109,763.08 | 24,718 | \$ 4.44 |
| ADUF/ODUF | \$ 18,180.35 | 24,718 | \$ 0.74 |
| Total | \$ 1,084,907.97 | 25,662 | \$ 42.28 |
| Non-recurring Charge | | | |
| UNE Loop Installation | Total Cost | Number of Lines | Cost per Line |
| Service Order | \$ 715.95 | 67 | \$ 10.69 |
| Manual Co-ordination | \$ 44.94 | 7 | \$ 6.42 |
| Loop Installation | \$ 4,670.96 | 62 | \$ 75.34 |
| Cross Connect Installation | \$ 376.37 | 16 | \$ 23.52 |
| Avg Cost per Installation | \$ 5,808.22 | 62 | \$ 93.68 |
| UNE Loop Disconnect | | | |
| Service Order | \$ 2.97 | 3 | \$ 0.99 |
| Loop Disconnect | \$ 435.78 | 9 | \$ 48.42 |
| Cross Connect Disconnect | \$ 36.42 | 3 | \$ 12.14 |
| Avg Cost per Disconnect | \$ 475.17 | 9 | \$ 52.80 |
| Resale to UNEP Conversion | \$ 171,040.00 | 17104 | \$ 10.00 |
| UNEP New Install | | | |
| Business | \$ 511.86 | 9 | \$ 56.87 |
| Residence | \$ 4,893.00 | 140 | \$ 34.95 |
| UNEP Conversion | \$ 1,820.00 | 182 | \$ 10.00 |
| UNEP Service Order | | | |
| Electronic SOMECC | \$ 5,309.50 | 1517 | \$ 3.50 |
| Manual SOMAN | \$ 130,169.46 | 16561 | \$ 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 | \$ 13,300.00 | | |
| Total OCC | \$ 626,667.95 | | |
| LPC and Taxes | | | |
| Total Invoice | \$ 1,711,575.92 | 25,662 | \$ 66.70 |



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 Conversion of Wholesale Services to Network Elements or Network Elements to Wholesale Services

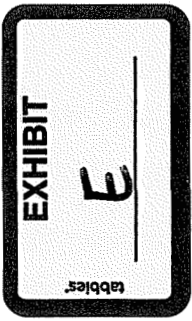
1.4.4.1 Upon request, AT&T shall convert a wholesale service, or group of wholesale services, to the equivalent Network Element or Combination that is available to SouthEast pursuant to this Agreement, or convert a Network Element or Combination that is available to SouthEast under this Agreement to 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 Procedures for Additional Designations of “Non-Impaired” Wire Centers.

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 (TRRO), 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.”



| CATEGORY | RATE ELEMENTS | Interim Zone | BCS | USOC | RATES(\$) | | | | Svc Order Submitted Manually per LSR | | Incremental Charge - Manual Svc Order vs. Electronic-1st | | Incremental Charge - Manual Svc Order vs. Electronic-Disc 1st | |
|----------|--|--------------|--------------------------|-------|--------------------|--------|-------------------------------|--------|--------------------------------------|-------|--|-------|---|-------|
| | | | | | Nonrecurring Add'l | | Nonrecurring Disconnect Add'l | | SOMEC | SOMAN | SOMAN | SOMAN | SOMAN | SOMAN |
| | | | | | Rec | First | First | Add'l | | | | | | |
| | | | UTD1, ULDD1, UNC1X | | | 0.00 | 0.00 | 0.00 | | | | | | |
| | Clear Channel Capability Extended Frame Option - per DS1 | | UTD1, ULDD1, UNC1X | CCOEF | | 0.00 | 0.00 | 0.00 | | | | | | |
| | Clear Channel Capability Super Frame Option - per DS1 | | UTD1, ULDD1, UNC1X | CCOEF | | 0.00 | 0.00 | 0.00 | | | | | | |
| | Clear Channel Capability (S/RESF) Option - Subsequent Activity - per DS1 | | ULDD1, UTD1, UNC1X, USL | NRCCS | | 184.91 | 23.92 | 1.99 | 0.78 | | | | | |
| | C-bit Parity Option - Subsequent Activity - per DS3 | | ULDD3, ULDD3, UE3, UNC3X | NRCCS | | 205.70 | 7.20 | 0.6924 | 0.00 | | | | | |
| | DS1/DS0 Channel System | | UNC1X | MG1 | | 57.26 | 14.74 | 1.66 | 1.67 | | | | | |
| | DS1/DS0 Channel System | | UNC3X, UNC3X | MG3 | | 158.20 | 56.53 | 15.12 | 5.30 | | | | | |
| | Voice Grade COCI in combination | | UNC3X, UNC3X | 1D1VG | | 0.6228 | 4.84 | | | | | | | |
| | Voice Grade COCI - for 2W-SLZ & 4W Voice Grade Local Loop | | UEA | 1D1VG | | 0.6228 | 4.84 | | | | | | | |
| | Voice Grade COCI - for connection to a channelized DS1 Local Channel in the same SMC as collocation | | UT1VC | 1D1VG | | 0.6228 | 4.84 | | | | | | | |
| | OCUDDP COCI (2+4-6kbps) in combination | | UNC3X | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | OCUDDP COCI (2+4-6kbps) - for connection to a channelized DS1 Local Channel in the same SMC as collocation | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | 2-wire ISDN COCI (BR1E) - for a Local Loop | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | 2-wire ISDN COCI (BR1E) in combination | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Local Channel in the same SMC as collocation | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | 2-wire ISDN COCI (BR1E) - for connection to a channelized DS1 Local Channel in the same SMC as collocation | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | DST COCI in combination | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | DST COCI - for Stand Alone Local Channel | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | DST COCI - for Stand Alone Interoffice Channel | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | DST COCI - for DS1 Local Loop | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | DST COCI - for connection to a channelized DS1 Local Channel in the same SMC as collocation | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Wholesale - UNE, Switch-As-is Conversion Charge | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Unbundled Misc Rate Element, SNE SA, Single Network Element - Switch As is Non-recurring Charge, per circuit (LSR) | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Unbundled Misc Rate Element, SNE SM, Single Network Element - Switch As is Non-recurring Charge, incremental charge per circuit on a spreadsheet | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Access to DCS - Customer Reconfiguration (FlexServ) | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Customer Reconfiguration Establishment | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | DST DCS Termination with DS0 Switching | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | DST DCS Termination with DS1 Switching | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Node (Synchronous) | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Node per month | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | Service Rearrangements | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | NFC - Change in Facility Assignment per circuit Service Rearrangement | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | NFC - Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed) | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | NFC - Order Coordination Specific Time - Dedicated Transport | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |
| | COMMINGLING | | ULBL | 1D1DD | | 1.32 | 6.71 | 4.84 | | | | | | |