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December 21, 2004

BY ELECTRONIC FILING

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Attached please find the CLEC Coalition's Comments on BellSouth's Preliminary Notification for February 2005 PMAP Changes in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/scd
Attachment
cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the CLEC's Reply was served by

U.S. Mail this 21st day of December 2004 to the following:

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s/ Tracy W. Hatch
Tracy W. Hatch

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)
of Operations Support System Permanent) Docket No. 000121A-TP
Performance Measures for Incumbent)
Local Exchange Telecommunications) Filed: December 21, 2004
Companies (BellSouth Track))
_____)

**CLEC COALITION COMMENTS ON
BELLSOUTH’S PRELIMINARY NOTIFICATION
FOR FEBRUARY, 2005 PMAP CHANGES**

The Competitive Local Exchange Carriers (“CLECs”), AT&T Communications of the Southern States, LLC; Birch Telecom; DIECA Communications Company d/b/a Covad Communications Company (“Covad”); ITC^DeltaCom Communications, Inc. (“ITC^DeltaCom/BTI”); MCImetro Access Transmission Services, LLC, and Network Telephone Corp., hereinafter collectively referred to as the “CLEC Coalition,” hereby file the following comments in response to BellSouth’s Proposed Notification Report for the January 2005 data month and Preliminary Notification Report for the data month of February 2005. Those reports are dated December 1, 2004 and are included as Attachment 1. The CLEC Coalition comments specifically on BellSouth’s Preliminary February 2005 Data Notification, Item 4. This item, among others, was discussed during an industry conference call on December 7, 2004.¹

I. FEBRUARY PRELIMINARY CHANGES

Item 4 states “Where a CLEC enters into an agreement(s) with BellSouth for services not subject to the SQM plan, such services should not be reflected in the SQM data in accordance

¹ A member the Florida Public Service Commission attended this call.

with the parties' agreement (s). BellSouth will implement coding changes to effect this change.” Further, during the December 7, 2004 conference call reviewing proposed changes to PMAP, BellSouth stated that unless services are required under 251, they are not subject to the SQM.

CLECs strongly disagree with BellSouth's position that it can unilaterally decide which processes and services are subject to the SQM plan, and therefore which performance result are to be reported. BellSouth's SQM and SEEM reporting requirements are clearly established by Order of this Commission, and can only be changed by subsequent Order of this Commission. If BellSouth wishes to make a change in its reporting requirements, it may either file comments in a Commission initiated SQM review, or petition the Commission to establish such a review. As this Commission (and BellSouth) is well aware, this issue is currently a disputed, open item in the current SQM and SEEM review, with comments by the parties filed in this docket on December 6, 2004. Therefore, BellSouth's inappropriate proposal to proceed with implementation in advance of a decision by this Commission should be rejected.

Respectfully submitted this 21st day of December, 2004.

CLEC COALITION

s/ Tracy Hatch

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