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February 1, 2007

Vicki Gordon Kaufman
Moyle, Flanigan, Katz, Raymond, White & Krasker, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

RECEIVED-FPSC
07 FEB -5 AM 9:13
COMMISSION
CLERK

Re: Docket No. 041269-TP
Revised Wire Center List
Carrier Notification SN91087013

Dear Vicki:

I am responding to your January 31, 2007 letter to Bennett Ross in which you question the appropriate classification of the MNDRFLLO wire center in Florida. No dispute exists that AT&T and BellSouth properly classified this wire center as a transport Tier 3 wire center in their Federal Communications Commission ("FCC") filing and Carrier Notification SN91087103 to implement the FCC's decision approving the merger between AT&T and BellSouth, which necessitated the exclusion of fiber-based collocation arrangements established by AT&T and its affiliates in identifying wire centers in which there is no impairment. However, your suggestion that the elimination of AT&T's fiber-based collocation arrangements caused the reclassification of MNDRFLLO as a transport Tier 2 to a transport Tier 3 wire center is not accurate.

In fact, MNDRFLLO has been classified as a Tier 3 wire center since September 2006, months before the merger was approved. Although MNDRFLLO initially was classified as a Tier 2 wire center after the completion of Docket No. 041269-TP, this classification was subsequently changed and the wire center was moved to the Tier 3 category after a Competing Local Exchange Carrier ("CLEC") advised that its prior statements in that proceeding that it was a fiber-based collocater in the MNDRFLLO wire center were not accurate. Upon learning this information, BellSouth promptly modified its list of impaired wire centers by removing the MNDRFLLO wire center from the Tier 2 category in Florida and issued Carrier Notification SN91086206 on

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Vicki Gordon Kaufman

February 1, 2007

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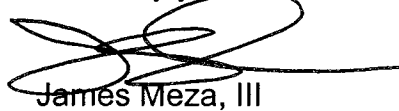
September 14, 2006 explaining this change. A copy of this carrier notification is enclosed for your convenience.

In addition, BellSouth notified the Florida Public Service Commission ("Commission") on September 21, 2006 via a letter filed in Docket No. 041269-TP that it (1) removed the MNDRFLLO wire center from its Master List; and (2) notified CLECs of this fact through Carrier Notification Letter SN91086206. This letter was served upon all parties of record.

In short, implementation of the merger conditions had no impact on the classification of MNDRFLLO, notwithstanding your suggestion to the contrary. While CompSouth's offer to work cooperatively with AT&T and BellSouth is appreciated, the process of developing the list of impaired wire centers consistent with the merger conditions has been completed, and it was a straightforward exercise that did not require assistance from CompSouth.

Please let me know if you have any questions or need additional information.

Sincerely yours,



James Meza, III

JM/dlr

cc: Chairman Lisa Polak Edgar
Commissioner Matthew M. Carter, II
Commissioner Katrina J. McMurrian
Blanca Bayo
Patrick K. Wiggins
Beth Salak
Tracy Hatch
Kristen E. Shore

Enclosure

666214



BellSouth Business Markets

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91086206**

Date: September 14, 2006

To: Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Interconnection/Contractual) – Update to the Master List of Wire Centers that Satisfy the Non-Impairment Thresholds in the BellSouth Region for the States of Florida and North Carolina

This is to advise that BellSouth's Master List of Unimpaired Wire Centers as Approved by State Commissions in its Region, which was announced in **Carrier Notification Letter SN91086135**, originally posted on July 19, 2006, and revised on September 1, 2006, has been updated to remove the MNDRFLLO wire center as an unimpaired wire center in Florida and to remove the WLMGNCWI wire center as an unimpaired wire center in North Carolina from BellSouth's Master List.

As information, the Florida Public Service Commission determined the list of BellSouth's unimpaired wire centers in its March 2, 2006 Order No. PSC-06-0172-FOF-TP (Order) in Docket No. 041269-TP, wherein it granted BellSouth Tier 2 transport relief in the MNDRFLLO wire center. Recently, while gathering information to respond to a request in another proceeding, a CLEC advised BellSouth that the CLEC's prior statement in Docket No. 041269-TP was inaccurate and that it was not a Fiber Based Collocator (FBC) in the MNDRFLLO wire center. Taking this revised information into account, the MNDRFLLO wire center did not meet the threshold necessary to attain unimpaired status. Therefore, BellSouth is removing the MNDRFLLO wire center in Florida from its Master List.

Additionally, BellSouth's Master List also incorrectly showed that the WLMGNCWI wire center in North Carolina was unimpaired for DS3 loops. Therefore, BellSouth is also removing the WLMGNCWI wire center from BellSouth's Master List.

BellSouth has determined that removing the MNDRFLLO and WLMGNCWI wire centers from BellSouth's list of unimpaired wire centers for the states of Florida and North Carolina has no impact on any loop or transport circuits previously obtained by CLECs in these wire centers. BellSouth has neither billed transition rates for these circuits, nor has it begun to convert these circuits to alternative arrangements pursuant to each respective Commission Order. Therefore, any existing Unbundled Network Element (UNE) transport circuits in these wire centers may remain as UNEs and new UNE loop and transport circuits may be obtained as UNEs, as applicable, in these wire centers. Further, BellSouth has not rejected, and it will not reject, UNE loop orders in the WLMGNCWI wire center in North Carolina, or UNE transport orders in the MNDRFLLO wire center in Florida based on the aforementioned findings.

If you have any questions, please contact your contract negotiator.

Sincerely,

ORIGINAL SIGNED BY KRISTEN E. SHORE

Kristen E. Shore – Director
BellSouth Business Markets