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January 26, 2011

Ms. Ann Cole Commission Clerk Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

COMMISSION CLERK claim of confidentiality notice of intent request for confidentiality filed by OPC 000/1 which For DN is in locked storage. You must be authorized to view this DN.-CLK

Re: Docket No. 090430-TP – Amended petition for verified emergency injunctive relief and request to restrict or prohibit AT&T from implementing its CLEC OSS related releases, by Saturn Telecommunications Services, Inc.

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Responses to Staff's questions in the above referenced docket.

Please note that a portion of the response to Question 2 contains proprietary confidential business information. Pursuant to Rule 25-22.006(5), Florida Administrative Code, AT&T Florida requests that the highlighted information in the attached responses be maintained by the Commission as confidential. In accordance with Rule 25-22.006(5), two redacted copies are being submitted in conjunction with the highlighted copy.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Tracy W. Hatch

ADM OPC CLK Proud Sponsor of the U.S. Olympic Teem

Enclosures

CERTIFICATE OF SERVICE Docket No. 090430-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U.S. Mail this 26th day of January, 2011 to the following:

Adam Teitzman Pauline Evans Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>ateitza@psc.state.fl.us</u> <u>pevans@psc.state.fl.us</u>

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Law Offices of Alan C. Gold, P.A. Alan Gold 1501 Sunset Drive Second Floor Coral Gables, FL 33143 Tel. No. (305) 667-0475 Fax. No. (305) 663-0799 agold@acgoldlaw.com

STS Telecom Mr. Keith Kramer P. O. Box 822270 Pembroke Pines, FL 33082-2270 Tel. No. (954) 252-1003 Fax No. (786) 363-0103 kkramer@ststelecom.com

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Tracy W. Hatch

AT&T Questions December 17, 2010



Issue 1:

1. Please refer to both AT&T's and STS' November 17, 2010 responses to staff's data request. STS states in its response that it can order a UNE SL2 DS0 commingled with a request "B" through the LEX ordering interface. However, on page 12 of STS' response, STS notes that a fictitious NCI code is populated in LEX when ordering a UNE SL2 DS0 commingled arrangement with a request type "B" (the correct NCI code is subsequently noted in the "remarks" field in LEX as special handling). STS can populate the correct NCI code in LEX when ordering a UNE SL2 DS0 commingled arrangement with a request type "A". Please explain why the NCI code that is used in the request type "A" commingled arrangement, or one of the three valid NCI codes, cannot be used in a request type "B" commingled arrangement.

Response: Req Type B commingled with Special access exceptions to the LSC for manual handing. Service Representatives have been trained to review STS' LSRs for both the NCI field and RMKS field. If the RMKS field is populated with 04QB9.11, 04QB6.S1 or 04QB6.33 the Service Representative will recognize that STS is ordering Req Type B with Commingling. Populating the NCI field with 04QB9.11, 04QB6.S1 or 04QB6.33 is not recommended and may cause additional confusion with downstream databases resulting in potential FOC or due date delays. Additional coding would be required to support the entries of 04QB9.11, 04QB6.S1 or 04QB6.33 in the NCI field.

2. With the exception of STS, how many other CLECs in Florida and in AT&T's southeast region currently order UNE SL2 DS0 commingled arrangements through LEX using one or more of the three valid NCI codes?

Response: No other CLECs have requested Req Type B commingled with Special Access, regardless of application. Additional coding would be required to support the entries of 04QB9.11, 04QB6.S1 or 04QB6.33 in the NCI field and would only satisfy STS' demand to dictate how AT&T develops its applications and business rules. [Proprietary]

Proprietary] It should further be noted that AT&T published the CLEC Information Package "Migrations to Commingled UVL-SL2 Loop with Number Portability" over 8 months ago (April 26, 2010)

Issue 3:

3. Would AT&T be amenable to providing the existing R/C/O tables in a Microsoft Word format to CLECs if **AT&T** is to be responsible for making the changes to the Word document to keep it up to date? If not, please explain. Additionally, as noted on page 20 of STS' response, please explain how a CLEC would be able to navigate the 1,707 page document without index tabs.

Response: No, AT&T will not continue to maintain the R/C/O tables. AT&T provided interested CLECs with the R/C/O file in Microsoft Word format. If requested, AT&T will also provide a .pdf file of the R/C/O data so that a CLEC can review the .pdf file and add tabs to the

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Microsoft Word file. In addition AT&T will make the R/C/O file available to interested CLECs in a .pdf format which supports bookmark. As previously stated, AT&T has already offered the R/C/O file in Microsoft Word format and, while some CLECs requested the file, STS did not.



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Re: Acknowledgement of Confidential Filing in Docket No. 090430-TP

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on January 26,

2011, in the above-referenced docket.

Document Number 00620-11 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña,

Records Management Assistant, at (850) 413-6393.