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TELECOMMUNICATIONS FILED NOV 2 3 2004 APSC

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VIA OVERNIGHT MAIL

Walter Thomas, Secretary
Alabama Public Service Commission
100 N. Union Street – 8th Floor
RSA Union Building
Montgomery, AL 36104

Re: Proposed Revisions to Price Regulation and Local Competition Plan
Docket No. 28590

Dear Mr. Thomas:

Enclosed are the original and ten (10) copies of BellSouth Telecommunications, Inc.'s *Comments* on the Revised ATRP as requested by the Commission in its November 5, 2004 Order. Please file and distribute as needed and return a stamped copy of this cover letter to me in the envelope provided.

Thank you for your assistance in this matter.

Sincerely yours,

Francis B. Semmes

FBS/mhs
Enclosures

cc: Honorable John Garner, ALJ (via overnight mail)
Mr. Larry Smith, Acting Director (via overnight mail & email)
Ms. Judy McLean, Director (via overnight mail)
Honorable James E. Wilson Esq. (via overnight mail)
Honorable Mark Montiel, Esq. (via overnight mail)
Honorable Terry Butts, Esq. (via overnight mail)
Parties of Record (via U S Mail)

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BEFORE THE
ALABAMA PUBLIC SERVICE COMMISSION

In Re:	)	
Proposed Revisions to the	)	**Docket No. 28590**
Price Regulation and Local	)	
Competition Plan	)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S COMMENTS IN RESPONSE TO THE STAFF'S RECOMMENDED REVISIONS TO THE ALABAMA TELECOMMUNICATIONS REGULATION PLAN

BellSouth Telecommunications, Inc. ("BellSouth"), through its undersigned counsel, files its comments to the Staff's recommended revisions to the Alabama Telecommunications Regulation Plan ("ATRP" or "the Plan"), as requested by the Alabama Public Service Commission's ("Commission's") Order dated November 5, 2004.

A. The Proposed ATRP Is a Step in the Right Direction.

When the *Petition of BellSouth Telecommunications, Inc. for Adoption of Metro Pricing Flexibility Plan* was filed on July 3, 2003, BellSouth stated:

> ...[T]here is a significant need to move across the continuum of regulation to a more flexible regulatory environment for the retail marketplace. Logically, the regulators' focus should shift from the prices of services provided by BellSouth to a more market-based and equitable form of regulatory oversight. The telecommunications industry and the telecommunications consumer will most benefit from regulatory policy that openly embraces steps towards deregulation and market processes rather than contrived competition or artificial market incentives. Competitive local exchange carriers, interexchange carriers, and wireless carriers have the freedom to respond to market demands and customer requirements as necessary with few regulatory constraints on the services they offer and the prices they charge.

Id. at p. 7. MCI, Inc., in a recent filing in California, stated:

> Twenty years after the breakup of the Bell System, the telecommunications industry is changing at a light-speed pace. The stand-alone long distance and stand-alone local consumer markets are eroding as the industry sees rate compression, and increasing substitution of wireless phones, Instant

> Messaging, pre-paid calling cards and e-mail. Consumers are increasingly looking for bundles of services, not just local and long distance, but local, long distance, wireline, broadband, entertainment and more. The convergence of voice and data, the rapid explosion of computer applications that use the Internet to transmit streaming audio and video, and enable two-way voice communications over the Internet (so-called "Voice over Internet Protocol" or "VoIP"), are rapidly contributing to the decline of the "traditional" voice market.
>
> As a result of the technological and industry trends, traditional wireline carriers are now facing competition, not just among themselves and from wireless carriers, but from non-traditional carriers, such as cable companies, VoIP providers, and soon even voice applications offerrd by other providers such as ISPs. The emergence of new, non-traditional carriers necessitates some fundamental changes in state regulation.[1]

Even though almost eighteen months separate these filings, the message is the same: It is time for state regulatory commissions to embrace and adopt even more deregulatory policies for telecommunications services and providers and allow market forces and processes to determine market outcomes. The Staff's proposed "BellSouth Price Flexibility Plan" begins that process.

When BellSouth filed its proposed Metro Pricing Flexibility Plan, BellSouth requested that the Commission embrace the following key concepts:

- Geographically based service categories and pricing rules:
  - i. 3 geographic tiers;
  - ii. Full pricing flexibility in Tier I, except for Switched Access and Local Access services;
  - iii. Limited pricing flexibility in Tier II and Non-MSA areas.
- Changes to current service categories.
- Changes to the tariff and pricing rules to permit full pricing flexibility for all services provided in Tier I MSAs, except Switched Access Services.
- All tariff filings considered presumptively valid upon filing.
- Descriptions and procedures governing the filing of promotional offerings, customer value programs, marketing/technical trials, and bundled services.

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[1] *See* MCI, Inc.'s Opening Comments filed with the California Public Utilities Commission on November 4, 2004, in Rulemaking 01-09-001, *Order Instituting Rulemaking on the Commission's Own Motion to Assess and Revise the New Regulatory Framework for Pacific Bell and Verizon California Incorporated* and Investigation 01-09-002, *Order Instituting Investigation on the Commission's Own Motion to Assess and Revise the New Regulatory Framework for Pacific Bell and Verizon California Incorporated*, at p. 7 (footnote regarding e-mail substitution levels omitted).

The Staff's proposed "BellSouth Pricing Flexibility Plan" embraces these concepts to a large extent. For example, the Staff proposes three geographic categories/tiers – Tier I MSAs, Tier II MSAs, and Non-MSA areas – with pricing rules specified for each category and with procedures for moving wire centers between the categories. Additionally, the Staff proposes in large part to adopt the service categories proposed by BellSouth – Retail Telecommunications Services and Interconnection Services. The Staff's proposed tariff and pricing rules permit flexibility in Tier I MSAs in recognition of the significant competition that already exists in those areas. Although the Staff proposal does not fully embrace the concept of presumptively valid tariffs upon filing, the Staff proposal does decrease the opportunity for third parties to attempt to delay the service offerings and prices that BellSouth will bring to the marketplace in the future. Finally, the Staff proposal specifies procedures for promotions, customer value programs, trials, and bundled services that recognize the changing nature of the marketplace and the need to offer customers what they desire on a timely basis.

The Staff's proposal does reflect movement across the continuum of regulation. Although BellSouth would prefer an even more deregulatory approach, the Staff's intent to conduct an assessment of the Plan after one year of operation will provide the opportunity for the Staff and the Commission to consider the inevitable, "light-speed" changes that dominate today's telecommunications marketplace and to implement future deregulatory initiatives.

B. Comments

BellSouth has attached as Exhibit A to these Comments a "redlined" version of Part I of the ATRP that includes the changes to the Staff's proposed revised ATRP that BellSouth would like adopted. Many of BellSouth's proposed changes are of the "housekeeping" variety—for example, correcting the company name and changing "ILEC" to "BellSouth" in the BellSouth

Price Flexibility Plan. BellSouth does not highlight these essentially non-substantive changes in its Comments. BellSouth does, however, explain the substantive changes that it would like to see adopted to Part I of the ATRP in Section 1 below.

Section 2 contains BellSouth's comments on the Service Quality Appendix to the ATRP.

Because Parts II through V of the ATRP, by in large, do not directly affect BellSouth, BellSouth does not comment on those parts of the Plan. It does reserve the right to address those parts and the comments directed to them during the reply period. BellSouth does, however, offer comments on local calling plans and intercarrier compensation issues raised by the non-BellSouth incumbent local exchange carriers ("the Independents"). BellSouth will address those issues in Section 3, below.

1. *Part I: BellSouth Price Flexibility Plan*

a. *Section 7 B (1): Pricing Rules—Retail Services/Flat Rate Residential and Business Services*

(1) In Section 7 B (1)(a), 1FB prices for wire centers in Tier III are capped for two years under the ATRP. Although BellSouth does not propose to change that provision, it does want to add language that would clarify that, if a request for a wire center reclassification pursuant to Section 3 of the ATRP for business service in Tier III to Tier II were granted or all wire centers in Non-MSA areas are classified as Tier II pursuant to footnote 3, the two-year price cap would not apply to the reassigned wire center. Though that proposition stands to reason, adoption of the suggested language would remove any ambiguity.

BellSouth also proposes to remove the language currently contained in footnote 5 to Section 7 B (1)(a). That footnote would require that, prior to the implementation of any increase in 1FR or 1FB prices in Rate Groups 1 through 5 to the price for Rate Group 6, BellSouth would be required to provide unlimited toll-free calling to communities of interest that would be

determined at the time of the increase. The workshops held by the Commission Staff, however, revealed that there were no major local calling plan problems in BellSouth's local service territories. Thus, this qualification is not necessary and should be deleted. Current Rule T-20 covers any situations that might require local calling plans to be implemented.

(2) In Section 7 B (1)(b), the Staff proposes that 1FR prices in all Tiers and 1FB prices in Tier III may increase up to 5% following the second and fourth anniversaries of the Plan. In addition, the Staff proposes a maximum price for 1FR service of $18.00 per month and a maximum price for 1FB service in Tier III of $39.95 per month. The Staff, however, proposes to make these potential increases contingent upon BellSouth meeting yet to be established service quality objectives (*see* Attachment D to the Staff's proposal).

First, BellSouth recommends that the Staff's proposed language regarding price increases being contingent upon the achievement of certain undefined service quality objectives be deleted. Once permanent service quality objectives are established (in BellSouth's proposed changes, following a year of Staff monitoring and assessment of reported service quality results and the scheduled review of the Plan following its first anniversary), the Staff and the Commission, following notice and hearing, can decide if penalty provisions should be incorporated into the final service quality process.

Second, BellSouth recommends the addition of new footnote. The footnote would provide a process through which BellSouth could be permitted to exceed the 5% price increase limits and two-year time periods for increases for 1FR service in all Tiers and for 1FB service in Tier III. This proposed flexibility would be limited to situations in which the Commission and BellSouth jointly agree to expand toll-free local calling areas and/or address local calling

exception areas and would provide a mechanism for recovering the costs of those types of initiatives.

b. Section 7 B (4): Other Retail Services.

The current Plan provides that Tier II increases should be limited to 15% in the first two years of the Plan and could potentially increase 5% per year thereafter. BellSouth does not object to this provision generally; it does, however, point out that small percentage increases for very inexpensive services, such as those that are priced on a low per minute or per use basis, amount to virtually no pricing flexibility at all. In those situations, the flexibility is illusory. Thus, BellSouth proposes a new footnote in Section 7 B (4), which would provide that, for services priced below $4.00 per month or per use, BellSouth would be permitted the flexibility to raise prices up to 50%, but with a proviso that the additional flexibility would end when the affected service reaches a price of $4.00 per month or per use. This exception would recognize the fact that even a large percentage of a small number yields a small number.

c. Section 7 C: Pricing Rules—Switched/Special Access Services and Local Access Services

The current ATRP provides that the combination of the traffic sensitive per minute usage charge for originating and terminating switched access will be capped at the effective intrastate level and that special access charges would be capped at the interstate level that is in place as of the date that the Plan is implemented. BellSouth maintains that there does not need to be a cap for special access charges, because competition in the marketplace is best suited to determine rates for "Special Access Service" lines. IDC's *"U.S. Private Line Forecast and Analysis, 2002 – 2007,"* for example, indicates a compound average growth rate (CAGR) for competitive local exchange carriers ("CLECs") of +5.5% for the period, while ILECs will experience a CAGR of -2.1%. Furthermore, INSIGHT Research Corp.'s *"Private Line Services 2002-2007"* study

expects the CLECs to demonstrate the highest growth rate in revenue of all carrier types, especially in retail revenue. CLEC revenues will grow from $2 billion in 1999 to $8.3 billion in 2007. Thus, no regulatory intervention should be necessary in the foreseeable future, and there need be no cap on special access.

Should the Commission decide, however, that there must be a cap on special access charges, BellSouth notes that the current ATRP provides that the combination of the traffic sensitive per minute usage charge for originating and terminating switched access will be capped at the effective *intrastate* level. Special access charges, however, would be capped at the *interstate* level that is in place as of the date that the Plan is implemented. If the Commission adopts a cap, BellSouth suggests for consistency and simplicity that both switched and special access charges be capped at the intrastate level.

d. Section 8 B: Contract Service Arrangements.

As currently written, Section 8 B of the Plan would require BellSouth to supply, with its summary of CSAs offered in the previous month, a TSLRIC cost support document. If the Staff wishes to review more detailed cost support for a particular CSA, BellSouth would give the Staff access to the cost support. BellSouth suggests that this section be slightly amended to conform to current practice and to reflect a more logical interpretation of what the Commission intended. Under its proposal, BellSouth would submit, with its *summary* of CSAs offered in a month, a *summary* of the TSLRIC support. It would then give the Staff (and the Attorney General, if requested) access to more detailed TSLRIC cost support.[2]

[2] BellSouth submits that this language is more of a "housekeeping" change, as it does reflect current practice and logically fits the framework in the Plan, but it includes the change in the substantive comments anyway.

e. Section 10: Service Quality

BellSouth suggests the changes to Section 10 in an effort to conform the narrative contained in the section to the proposed changes in the "Service Quality" section, Appendix B hereto. Like the change mentioned directly above, these changes are in the nature of a non-substantive change for the purposes of these Comments, as the substantive portions of BellSouth's comments on the Service Quality material can be found below, at Section 2(b).

f. Section 11: Customer Notification

BellSouth agrees that customers should be notified of price increases prior to such increases becoming effective. BellSouth urges the Commission, however, to make one minor amendment to the Staffs' proposed Customer Notification rules—the deletion of the requirement that the notification include the existing prices.

For customers who purchase complex services, it will be difficult, onerous, and potentially voluminous, to create tables showing old prices and new prices. In addition, customers know the current prices that they are paying for their services. Eliminating the proposed requirement will eliminate cost and streamline the customer notification process.

2. *Appendix*: *Service Quality*

As BellSouth stated in the various workshops on service quality, BellSouth does not believe that the proposed service quality measures are necessary given the highly competitive environment which currently exists within the telecommunications industry in Alabama. The marketplace sufficiently standardizes carriers' performance rendering quality of service measures largely irrelevant. If consumers are dissatisfied with the level of service supplied by a given provider, they can readily avail themselves of the services offered by a number of other telecommunications providers (e.g., competitive local exchange carriers, wireless providers,

CATV voice and/or VoIP providers, etc.). Given the high level of consumer choice brought about by competition in the marketplace, these quality of service measures are no longer needed, particularly for business customers.

BellSouth acknowledges that the current Staff proposal for service quality monitoring and reporting has been modified to address many of BellSouth's concerns. For the most part, the Staff proposal appears to apply fairly consistently across all regulated providers of local service. In addition, the current proposal almost eliminates service quality reporting and monitoring for business customers, with the one exception being in the area of Trouble Reports. Most importantly, the current proposal provides that the Staff will receive and monitor the data that is reported by the various providers for a full year and then proceed to establish permanent measures and, if needed, permanent service quality objectives. There remain, however, a few additional modifications that BellSouth recommends be made to the telephone service quality reporting process. Those changes appear in Exhibit B, hereto.

General Section

Under the "General" section of the service quality proposal, BellSouth recommends that language be added in item 2 to state that the issue of penalty provisions for failures to achieve service quality performance measures will be addressed following the one year of data monitoring and the establishment of permanent service quality objectives.

Second, BellSouth recommends that the Staff's proposed "Broadband Infrastructure Deployment Status/Plans" be deleted. Because BellSouth must already report broadband information to the Federal Communications Commission on a semi-annual basis, it is not

necessary or appropriate to require the creation of a new reporting requirement at the state level.[3] To the extent that additional information regarding broadband may be needed periodically by the Commission, such needs should be addressed on a case-by-case basis, and information should be required from all broadband providers serving Alabama consumers.

Next, BellSouth recommends the addition of a "Reporting Format" discussion under the "General" section. Hopefully, this discussion and the associated Excel spreadsheets (Exhibit C, hereto) will ensure consistency across all reporting entities.

The final item under the "General" section relates to the discussion on "Commission Review." As part of the process of reviewing a year's worth of reported service quality data and formulating permanent service quality objectives, BellSouth recommends that the Staff also review the necessity of reporting wire center detail information.

Access Line Activity Report

BellSouth proposes a change to the definition of retail lines (or end user lines) to conform the report to FCC Form 477 definitions. This will assure a consistent definition of line counts for all reporting companies.

Residential Installations Report

BellSouth proposes to clarify that "working days" also excludes any customer-requested due dates that exceed five working days.

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[3] In a Report and Order adopted on November 9, 2004 and released on November 12, 2004 in WC Docket No. 04-141, the FCC adopted rules intended to improve its Form 477 local competition and broadband data gathering program. In the future, all facilities-based providers of broadband connections to end users will be required to report broadband data to the FCC. In addition, filers will be required to report the percentage of broadband connections that are faster than 200 Kbps in both directions and to categorize those connections into five "speed tiers," to report broadband connections by technology category (asymmetric xDSL, symmetric xDSL, traditional wireline, cable modem, optical carrier, satellite, power line, etc.), and to require ILECs and cable system operators to report broadband connections available to the end user premises for those customers subscribing to the ILEC's or cable operator's traditional service. The FCC made other changes to its data gathering process in addition to those specified preceding.

Troubles Report

BellSouth recommends that, for purposes of BellSouth's reporting, the <1000 line category be eliminated. Given the size of current BellSouth wire centers, BellSouth would have only one wire center in this category.

BellSouth further proposes a distinction between designed lines and non-designed lines. BellSouth has traditionally separated designed lines from non-designed lines in its trouble reporting systems, because these two very different line categories are serviced by separate and distinct work groups. Examples of designed lines include ISDN lines and PBX trunks. BellSouth suggests that the trouble report data collected here be for non-designed lines, in keeping with its current trouble reporting systems.

BellSouth further suggests that the traditional terminology of report rate per 100 access lines be retained. It also suggests that the traditional terminology and measure of out-of-service troubles and percent repeat reports be expressed as a percentage of the troubles being counted. For example, a trouble report objective measure would be expressed in terms of report rate per 100 non-designed lines, while the Out-of-Service (OOS) and Repeat Report objectives would be expressed as the percentage of the total troubles being reported for non-designed lines.

Residential Repair Response Report

In this category, BellSouth suggests that the 36- and 72-hour periods include workday business and non-business hours, but that they exclude weekends and holidays.

Answer Time Report

BellSouth feels strongly that "automated means" and "Web-based" numbers should be included in this category. BellSouth's customers have three alternate methods of access to repair that are being used at an increasing rate, and many customers prefer alternate access to the

traditional method of talking to a live attendant. BellSouth's new interactive voice response unit (IVR) answers immediately, and trouble tickets may be handled to completion without a live attendant ever being involved. Another alternate method is e-mail or web transactions. Again, the customer concern may be satisfactorily handled without having a live conversation with a repair attendant. For those customers who wish to talk with an attendant but do not want to wait, BellSouth offers a customer call-back option, which lets the customer decide if he or she wants to wait in queue for a live attendant or to be called back at a time of his choosing.

It is difficult to account for these innovative, but effective, customer-oriented tools in traditional speed-of-answer measures. They do, however, help provide a high level of customer satisfaction. Including these modern problem-solvers in the answer time calculation would yield a more accurate picture of customer service in the information age.[4]

3. *Local Calling Plans and Intercarrier Compensation Issues*

The Commission has solicited comments on the motion that was filed by the non-BellSouth ILECs on November 1, 2004.[5] In that Motion, the Independents requested that the Commission incorporate into the record of this case information obtained as a result of workshops held to address the intercarrier compensation and calling plans. More substantively, the Motion also requested that the Commission incorporate into the Price Regulation Plan those intercarrier compensation provisions "necessary" for the ILECs to meet the calling plan mandates contained in the plan. Motion, p. 1.

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[4] BellSouth's consumer Web transactions are expected to exceed 57 million by the end of 2004. Monthly Web transactions could exceed the number of customer calls to the business office by the end of 2004, as well.

[5] *Petition of Non-BellSouth ILECs to Incorporate Results of Intercarrier Compensation Workshop in Regulation Plan*, Docket No. 28590, filed November 1, 2004 ("Motion").

As an initial matter, BellSouth notes that information obtained or presented in informal workshops was intended to be background information for all parties and the Commission staff to use in formulating positions. The information presented, though useful and informative, was not, and was not intended to be, of "docket quality." That is to say, the information presented was not introduced under oath, nor was it subject to cross-examination. In many instances, the information presented was not even committed to writing. Thus, BellSouth questions the utility of, the need to, the propriety of, and the reason for incorporating such information into the "official record" of this matter.

As to the alleged problem and the solution[6] proposed by the Independents in the Motion, BellSouth notes that, contrary to the premise of the Motion, 1) neither the ATRP adopted by the Commission nor the Staff's proposed revisions contains a mandate that the Independents implement local calling plans or county-wide calling; 2) intercarrier compensation is not at the core of the Staff's proposed revisions to the ATRP; and 3) additional local calling needs can be addressed by current Telephone Rule 20, either on a company-by-company basis or on a group basis.[7] County-wide calling and/or expansion of toll-free local calling areas, though a desirable and laudable goal, is a multi-faceted problem that is neither logically nor analytically intertwined

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[6] The "solution" proposed by the Independents is the establishment of a subsidy fund, the Alabama Access Reduction Fund ("AARF"), which would consist of the revenue differential between current and to-be-reduced intrastate access rates of all Alabama ILECs, paid into the fund by all providers of interexchange services that are subject to regulation by the Commission. The Independents would draw from this fund amounts allegedly required to "make them whole" for access charges that are "lost" to them by the implementation of expanded local calling areas. According to information adduced in the workshops, however, it would seem that the Independents are actually seeking to be "made whole" for the loss of access revenue brought about by industry change, only a part of which would be attributable to expanded local calling areas. One of the primary losses of access revenues is due to wireless substitution, and a primary area of threatened loss is the advent of VoIP providers.

[7] Until an Independent makes an individualized showing under Rule T-20 that would permit the Commission to evaluate the proposal in terms of proposed prices, coverage, revenue gain or loss, impact on other LECs, community of interest factors, expected "take" rates and call stimulation, additional facilities, expected future expenses (including terminating access charges), expected intraLATA fund impacts, and the like, the Commission, according to its own rules, cannot properly evaluate whether such a plan would be in the public or the submitting company's interest. The Commission should not permit itself to be rushed into a decision on a "take my word for it" basis.

with the ATRP; it can, and should, be dealt with separately, after many obvious problems are worked through. Nor is intercarrier compensation inextricably linked either to county-wide calling or the ATRP; indeed, the FCC is in the process of taking steps to address the many issues involved in that subject.

The Revised ATRP requires implementation of a local calling plan if, and only if, an Independent Company *voluntarily elects* to be regulated pursuant to Part III of the ATRP, the "ILEC Price Flexibility Plan." In order to be treated under Part III, an Independent must have a price for 1FR service of no more than $16.30; have waived the Act's "rural exemption" from competition and agreed to offer resale and unbundled network elements; have agreed to negotiate with CLECs and agrees to Commission mediation and/or arbitration; and have an approved, optional local calling plan. (Today, it is unclear if *any* Independent other than CenturyTel has agreed, or will agree, to waive the "rural exemption" contained in Section 251(f) of the Act.) Thus, because an Independent does not have the ability to elect treatment under Section III of the ATRP until *after* the ATRP is approved, the Commission can—and should—approve the Staff's proposed revisions to ATRP without reference to the many unresolved details of Independent local calling plans and possible shortcomings of the proposed "solution." Ironing out details of local calling plans and other impediments to potential solutions[8] can be resolved at a later date under existing processes.

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[8] Two significant potential legal impediments that are not likely to be able to be dealt with in any short time period are: 1) if BellSouth is involved in an optional local calling plan that involves crossing a LATA boundary, approval by the FCC of a waiver of the interLATA restriction is highly problematic—indeed, BellSouth is unaware of a single instance when such a waiver has been granted for other than a non-optional plan; and 2) the proposed AARF may very well run afoul of Section 253(a) of the Act. See FCC *Memorandum Opinion and Order*, File No. CWD 98-90 (Western Wireless Corp.), FCC 00-309 (released August 28, 2000) (opining that an access charge reduction mechanism that makes only ILECs eligible for explicit support may unlawfully discriminate against non-ILEC carriers in violation of Section 253(a) of the Act). Furthermore, because of the significant amount of competition in the marketplace and the substantial number of competitors that are not regulated by the Commission, it is not appropriate for the Commission to create an artificial mechanism, such as the AARF, that only partially addresses issues brought to the forefront by rapidly-growing local competition and rapidly advancing technologies

Thus, BellSouth proposes that the Commission deny the Independents' Motion and, after the comment and reply cycle, approve the Staff's proposed revision to the ATRP. Then, for BellSouth's serving area, if any significant local calling problem areas exist—and BellSouth does not think that there are more than a handful of potential situations—the Commission can address those issues on an area-by-area basis in a separate proceeding, applying the provisions of Rule T-20. For the Independents' serving areas, the Commission should address problem situations on a company-by-company basis or on a group basis in a separate proceeding, again applying the provisions of Rule T-20. Only in that fashion can the Commission adequately address the factors outlined in Rule T-20. In any event, however, the Commission should not, given industry changes and the likelihood of the FCC's modifying the current intercarrier compensation regime and addressing universal service funding, create any new (and potentially unlawful) subsidy structures and mechanisms.

C. Conclusion

BellSouth appreciates the time, effort, and resources that the Staff, and the industry participants, have put into this effort. The Staff, in particular, has assimilated and analyzed a tremendous amount of material. The proposed Plan is a positive step toward addressing the rapid pace of change that the industry has seen over the past few years. Indeed, the pace has accelerated since BellSouth filed its petition for adoption of the Metro Pricing Flexibility Plan almost 18 months ago. Wireless substitution, VOIP, and the evolution from narrowband to broadband are occurring faster and faster.

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and delivery platforms. The Commission should attempt to implement solutions only after the FCC has issued forthcoming orders that will address intercarrier compensation arrangements and universal service arrangements

As markets change, the rules governing them must change as well. This is an increasingly difficult challenge to meet in today's converging telecommunications market. With the modifications suggested by BellSouth, the Plan is a positive step toward meeting this challenge and will bring Alabama consumers the benefits of modern telecommunications markets. BellSouth respectfully requests that the Commission adopt the Staff recommendations, with the modifications suggested herein.

Respectfully submitted this 23d day of November, 2004.

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TELECOMMUNICATIONS, INC.

559608

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing *Comments of BellSouth Telecommunications, Inc.* on all parties of record by placing a copy of same in the United States Mail, postage prepaid, on this the **23rd** day of **November, 2004**.

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FRANCIS B. SEMMES

APPENDIX A
STAFF PROPOSED
ALABAMA TELECOMMUNICATIONS REGULATION PLAN

The Staff Proposed Alabama Telecommunications Regulation Plan (TELCOM REG PLAN) is applicable to those telecommunications service providers, defined herein, regulated by the Alabama Public Service Commission. Recognizing that there are distinct regulatory requirements pertinent to each type service provider, the Commission Staff (hereafter referred to as "the Sstaff") has separated the Regulation Plan into parts applicable to each. Part I applies to BellSouth Telecommunications, Inc. ~~Company~~, Parts II and III apply to other incumbent local exchange carriers ("ILECs"), Part IV applies to competitive local exchange carriers ("CLECs") and Part V applies to toll carriers and toll resellers.

Each Part of the TELCOM REG PLAN stands on its own and the Commission may approve all or selected parts of the plan at its discretion.

TABLE OF CONTENTS

PART I	BellSouth Price Flexibility Plan	pages 1 through 21
PART II	ILEC Price Cap Plan	pages 22 through 33
PART III	ILEC Price Flexibility Plan	pages 34 through 50
PART IV	CLEC Price Flexibility Plan	pages 51 through 58
PART V	Toll Service Provider Streamlined Regulation Plan	pages 59 through 62

PART I

BELLSOUTH PRICE FLEXIBILITY PLAN

1. APPLICABILITY OF THE BELLSOUTH PRICE FLEXIBILITY PLAN

The Staff Proposed BellSouth Price Flexibility Plan ("the Bell Plan" or the "Plan") for BellSouth Telecommunications, Inc. ("BellSouth") will apply to all telecommunications services offered by BellSouth and regulated by the Alabama Public Service Commission (hereinafter referred to as "the Commission").

2. DEFINITIONS

A. "Bundled Services" are a combination of services offered as a package, whether at a single price or with the availability of the price for one contingent on the purchase of the other(s). A Bundled Service may be comprised of any telecommunications service or non-telecommunication service offered by BellSouth~~the ILEC~~ in any combination with

telecommunication or non-telecommunication service(s) offered by a BellSouth~~an ILEC's~~ affiliate and/or with a non-affiliated third party provider.

B. "Contract Service Arrangement" ("CSA") is an arrangement wherein BellSouth provides services pursuant to a contract between BellSouth and customers in Tier I where competitive alternatives are known to exist and in Tier II and Tier III in response to a competitive alternative or other unique circumstances[1]. Such arrangements include situations in which the services are not otherwise available through BellSouth's tariffs, as well as situations in which the services are available through BellSouth's tariffs, but BellSouth offers those services at prices other than those specified in BellSouth's tariffs.

C. "Customer Value Program" (CVP) is the offering of a telecommunications service, combination of telecommunications services, or a telecommunications service or combination of telecommunications services in conjunction with a non-regulated service and/or non-telecommunications service by BellSouth~~ILECs~~ to eligible customers in BellSouth's~~the ILEC's~~ service area. Customers subscribing to such programs will receive ongoing benefits for a duration that may exceed ninety (90) calendar days. Essentially, CVPs are long-term promotions (greater than 90 days in duration).

D. "Effective Date" is the proposed date on which a new tariff or tariff revision is considered effective. The Effective Date is based on a specified number of ~~w~~Work D~~d~~ays following, but excluding, the File Date.

E. "Eligibility Criteria" are the factors used to determine the customers and/or potential customers who would qualify for a Promotion, Customer Value Program, Marketing/Technical Trial, or Bundled Service: i.e., current services or services a customer must subscribe to, monthly spend, service or usage volume, term commitment, geographic location, such as wire center, and/or any other identifiable characteristic.

F. "File Date" is the official date recorded by the office of the Director of the Commission's Administrative Division (Commission Secretary) for any proposed tariff or tariff revision submitted by a telecommunications provider and accepted by the Commission. The File Date is considered administrative in nature.

G. "Interconnection Services" include Switched Access Services, Special Access Services, and Local Access Services and are defined as follows:

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[1] The term "competitive alternative" is defined as products and/or services offered by a telecommunications carrier who has the capability of providing the services to the customer at the time and place of the customer's choosing and whose availability and pricing are such that BellSouth's customers are reasonably expected to switch to a competitive provider. The Commission shall determine, on a case-by-case basis, the reasonableness of claims that competitive alternatives exist. The term "other unique circumstances" is defined as a unique customer telecommunications service requirement wherein a competitive alternative does not necessarily exist but the arrangement of products and/or services is generally unavailable in the approved tariff or wherein the Commission deems it to be in the public interest to offer the products and services at prices below those authorized in the approved tariff on a case-by-case basis.

(1) "Switched Access Services" allow toll providers to interconnect to BellSouth's network in order to originate or terminate switched toll calls.

(2) "Special Access Services" are services providing an analog or digital transmission path that is not switched by a BellSouth end office to directly connect an interexchange carrier's ("IXC's") terminal location and an end user's premises, two IXC terminal locations, an IXC terminal location and a hub, or two end user premises.

(3) "Local Access Services" allow competitive local exchange carriers ("CLECs") or other providers of local exchange services to complete local calls via BellSouth's network pursuant to the Telecommunications Act of 1996 ("the Act") through the interconnection of a CLEC's or other provider's network to BellSouth's network, through the resale by a CLEC of BellSouth's regulated retail services, or through the purchase by the CLEC of unbundled network elements ("UNEs") offered by BellSouth.

H. Intra/Inter-modal[2] is a categorization that, for purposes of this Plan, describes competition for wire line subscribers in relation to the delivery means used by ILECs for provisioning local exchange service. Intra-modal competition describes basic local telephone service provided by regulated telecommunication carriers, over cable or wire, to subscribers within the ILEC's exchange boundary to include telecommunications over CATV and power lines. Wire line competition exists when local telephone services are generally available to subscribers within the ILEC's exchange boundary at a level of service and at prices that make them a reasonable and viable alternative to the ILEC's services. Business private line arrangements alone are not a sufficient indicator of wire line competition. Inter-modal competition is local telephone service provided primarily by means other than cable or wire, such as wireless telecommunications service.

I. "Marketing/Technical Trial" is the offering of a telecommunications service, combination of telecommunications services, or a telecommunications service or combination of telecommunications services in conjunction with a non-regulated service and/or non-telecommunications service by BellSouth to eligible customers on a trial basis in BellSouth's service area for technical and/or marketing purposes. Such trials shall be for the purpose of evaluating, in an operating environment, the performance and pricing of the specific service or services in conjunction with other marketing and environmental factors that can influence customer demand.

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[2] The Commission's definition of intra/inter-modal competition, for purposes of this plan, may differ from the Federal Communications Commission ("FCC") definition. The FCC defines *inter-modal alternatives* as "facilities or technologies other than those found in traditional telephone networks. These include, for example, traditional or new cable plant, wireless technologies (satellite, mobile, or fixed), power line (electric grid) technologies, or other technologies not rooted in telephone networks." The Commission's definition recognizes that wire line, local exchange service, available from an alternative to the ILEC, is competition regardless of whether the service is provided by delivery means traditionally utilized by ILECs

J. "Metropolitan Statistical Area" ("MSA") is an area, as defined by the Office of Management and Budget, with a large population nucleus that together with adjacent communities, has a high degree of social and economic integration.

K. "New Service" is a regulated function, feature, capability, or any combination thereof, which is not offered by BellSouth as of the effective date of this Plan.

L. "Non-discretionary Retail Telecommunication Services" are those services for which the Commission limits the degree of regulatory discretion otherwise provided in the Plan for Retail Telecommunications Services.

M. "Promotion" is the offering of a telecommunications service, combination of telecommunications services, or a telecommunications service or combination of telecommunications services in conjunction with a non-regulated service and/or non-telecommunications service by ~~ILECs~~BellSouth to eligible customers in BellSouth's~~the ILEC's~~ service area. Customers subscribing to promotional offerings receive a one-time or short-term benefit that shall not exceed ninety (90) calendar days.

N. "Retail Telecommunications Services" are the telecommunications services, other than Interconnection Services, which are offered by BellSouth and regulated by the Commission.

O. "Telecommunications Service" is the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available to the public, regardless of the facilities used.

P. The term "Tier" refers to a category of wire centers demonstrating similar levels of competitive activity and may include only a subcategory of service associated with a wire center (business or residential).

Q. Total Service Long Run Incremental Cost ('TSLRIC') is the incremental cost that would be incurred for the entire volume of a service. TSLRIC methodology considers all volume sensitive costs (i.e., costs that change with a change in unit demand) and volume insensitive costs (i.e., costs that do not change with a change in unit demand, but are required by the service) directly caused by and associated with that service.

R. "Work Day" is defined as Monday through Friday and excludes weekends and officially recognized State holidays.

3. COMPETITIVE CATEGORIES (TIERS)

For purposes of the Plan, BellSouth's service territory shall first be divided into geographical affiliation based on Metropolitan Statistical Areas ("MSAs"). However, the MSAs shall only be used as a guideline for assigning wire centers to a competitive Tier. Competitive activity and not geographical affiliation ultimately determines wire center assignment to one of three

(3) Tiers. Each Tier will contain wire centers demonstrating similar competitive activity. Because competition for business telecommunication services can develop absent a similar level of competitive activity for residence service, a wire center may be assigned to one competitive Tier for business service and another for residential service. —BellSouth shall request assignment of wire centers and provide justification for the proposed assignment. The Commission, however, will determine the initial classification of wire centers to each of the competitive Tiers. Additionally, on each anniversary of the Plan, the Commission may review and redefine the criteria used to assign wire centers to each of the competitive Tiers.

Initially, the following MSAs shall be designated as Tier I MSAs: Birmingham-Hoover, Mobile, Montgomery, and Huntsville. The remaining MSAs, Anniston, Auburn/Opelika, Columbus (Georgia), Decatur, Florence, Gadsden, Pensacola (Florida), and Tuscaloosa, shall be designated as Tier II MSAs. The Non-MSA areas of the State shall be grouped together for regulatory purposes into Tier III[3]. ~~Additional criteria~~ If deemed necessary, criteria in addition to those specified in Section 4 for defining levels of competitive activity will be identified by the Commission and the Company and wire centers shall be assigned to Tier I, Tier II, or Tier III on that basis~~before the implementation of the Plan~~.

4. CLASSIFICATION AND RECLASSIFICATION OF WIRE CENTERS

Factors upon which BellSouth may request classification of wire centers into the competitive Tiers may include, but are not limited to, collocation arrangements, residential and/or business competitive market share, alternative sources of switching, alternative sources of transport, etc. Further, pricing and availability of competitive residential alternatives will be used to determine the classification of residential service in each wire center to a competitive category. BellSouth will submit supporting documentation justifying the requested classification.

On each anniversary of the Plan, BellSouth may file requests to reclassify Tier I, Tier II, or Tier III wire centers. BellSouth shall file supporting documentation justifying the reclassification of wire centers to a different competitive Tier. Factors upon which BellSouth may base its reclassification request are referenced in the preceding paragraph and must include a separate analysis for residential service.

5. SERVICE CATEGORIES

Each telecommunications service offered by BellSouth and regulated by the Commission shall be assigned to one of two (2) categories: (1) Retail; and (2) Interconnection Services. (See Attachment B for the classification of services by category as of the effective date of this Plan.)

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[3] All non-MSA wire centers will be assigned to Tier II upon demonstration by the ILEC to the Commission's satisfaction that fifty (50) percent or more of the ILEC's non-MSA wire centers are experiencing intra-modal, UNE or facilities-based competition (resale competition excluded) as evidenced by wire line telephone service being provided to subscribers within the non-MSA wire center boundary.

6. TARIFFS

BellSouth shall file tariffs for all telecommunications services offered by BellSouth and regulated by the Commission, except as specifically exempted herein. Tariffs shall be filed for any proposed change to terms, conditions, and/or prices.

Tariffs shall become effective in accordance with the provisions of subsections (A) – (F) below. The Commission retains the authority to investigate a tariff on its own motion, by intervention of another party, or as the result of a complaint filed pursuant to §37-1-83 of the Code. Any such motion, intervention or complaint shall specifically enumerate the rules and regulations of the Plan and/or Title 37 of the Code of Alabama, 1975 (the "Code") that have been violated.

If the Commission initiates an investigation of a tariff on its own motion, the tariff in question may be suspended for up to ninety (90) days. If the Commission initiates an investigation based on the intervention of another party or the filing of a complaint pursuant to §37-1-83 of the Code, the tariff shall remain in effect pending completion of the investigation and hearing. In lieu of the suspension of proposed tariffs as the result of intervention by another party or the filing of a complaint by another party pursuant to §37-1-83 of the Code, the following procedures will be in effect.

If the Commission initiates an investigation of a tariff based on the intervention or complaint of another party within sixty (60) days of the effective date of said tariff and orders a decrease in a price or prices contained therein, BellSouth shall be required to credit the difference between the effective price or prices and the Commission-ordered price or prices to affected customers during that period of time the tariff was effective, but not to exceed one-hundred, fifty (150) days.

A. Tariffs proposing changes to terms or conditions for telecommunications services offered by BellSouth and regulated by the Commission shall be filed with an Effective Date at least ten (10) ~~w~~Work ~~d~~Days following the File Date.

B. Tariffs proposing price reductions for telecommunications services offered by BellSouth and regulated by the Commission shall be filed with an Effective Date at least five (5) W~~w~~ork ~~d~~Days following the File Date.

C. Tariffs proposing price increases for Retail Telecommunications Services[4], Switched Access Services, or Special Access Services in Tier I shall be filed with an Effective Date at least five (5) ~~w~~Work ~~d~~Days following the File Date. Price increases for Retail Telecommunications Services, Switched Access Services, or Special Access Services in Tier II and Tier III shall be filed with an Effective Date at least ten (10) ~~w~~Work ~~d~~Days following the File Date.

[4] Except those Retail Telecommunication Services listed as "Non-discretionary" in Attachment B.

D. Tariffs proposing price increases for Non-discretionary Retail Telecommunication Services, as annotated on Attachment B, shall be filed with an Effective date at least thirty (30) ~~w~~Work ~~d~~Days following the File Date.

E. Tariffs for New Services shall be filed with an Effective Date at least five (5) ~~w~~Work ~~d~~Days following the File Date.

F. Tariffs that grandfather and/or eliminate telecommunications services shall be filed with an Effective Date at least twenty-five (25) W~~w~~ork ~~d~~Days following the File Date. For tariffs that eliminate telecommunications services, the tariff shall provide customers no less than one hundred, eighty (180) calendar days following the Effective Date during which affected customers will be given the opportunity to subscribe to alternative services before a customer's current services are eliminated.

7. PRICING RULES

A. Pricing Rules – General

(1) The price for any new or existing service shall equal or exceed its TSLRIC unless: (1) specifically exempted by the Commission based on public interest concerns; or (2) BellSouth in good faith, and upon Commission approval, prices the service in order to meet the equally low price of a competitor.

(2) In the event that BellSouth prices a service below TSLRIC to meet the equally low price of a competitor, any intrastate universal service fund which may exist cannot be utilized to offset the resulting revenue shortfall.

(3) No price reductions that will result in prices below TSLRIC will be allowed unless approved by the Commission. No price reductions will be allowed for any existing services that are priced below TSLRIC on the effective date of this Plan, unless approved by the Commission.

(4) When no TSLRIC study is readily available, the Commission may, at its discretion, consider a surrogate for the TSLRIC cost study as the basis for analyzing the price floor requirement.

B. Pricing Rules – Retail Services

(1) FLAT-RATE RESIDENTIAL AND BUSINESS SERVICE

a. Following Commission approval of the Plan, prices for 1FR and 1FB service in Rate Groups 1-5 may be increased to the prices for Rate Group 6, creating a single BellSouth statewide 1FR price of $16.30[5] and a 1FB price of $36.23.

[5] ~~Prior to the implementation of this increase, the Company shall provide unlimited toll-free local calling to the community(ties) of interest agreed upon by the Company and the Commission for all of BellSouth's wire centers.~~

Thereafter, 1FB prices in Tier I and Tier II shall be adjusted at the discretion of BellSouth subject to the limitations specified for Other Retail Telecommunication Services in Part 7B(4). For Tier III wire centers, 1FB prices shall be capped for two years, unless the Commission approves the classification of Non-MSA wire centers/Tier III into Tier II as specified in Footnote 3.

b. Following the second and fourth anniversaries of this Plan, prices for 1FR service (including 1FB for Tier III subject to Footnote 3) may, at the discretion of the Company[6], be increased by five percent (5%). However, the tariff price for 1FR service shall not exceed eighteen dollars ($18) per month and the tariff price for 1FB service in Tier III shall not exceed $39.95 per month (subject to Footnote 6) unless, following notice and hearing, specifically approved by the Commission.[7] ~~Price increases for 1FR service (including 1FB for Tier III) will only be authorized in those wire centers compliant with the Commission's service quality objectives set forth in this Plan (as of the applicable anniversary date referenced above). Otherwise, prices for 1FR service (including 1FB for Tier III) in those wire centers that fail to meet the service quality objectives will remain unchanged until found in compliance.~~

c. Within 90 days following the fourth anniversary of the plan, the Commission will make a further assessment of 1FR and 1FB prices and may schedule future adjustments as deemed necessary.

(2) NON-DISCRETIONARY RETAIL SERVICES

Prices for Non-discretionary Retail Telecommunication Services, annotated on Attachment B, shall not be increased at the discretion of BellSouth. The Company may request increases for prices of these services, on a case-by-case basis, in accordance with the filing requirements identified in part 6D of this Plan. In evaluating such requested price increases, the Commission will take into account prices for the same or equivalent services in other states within BellSouth's operating area.

(3) VERTICAL SERVICES

Upon approval of this Plan for BellSouth, the price for Residential Call Waiting, Caller I.D. and Caller I.D. Deluxe may be adjusted to mirror existing prices in any one of the states within BellSouth's operating area. Thereafter, prices for Residential Call Waiting,

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~~Included with the implementation of this toll-free local calling service will be the elimination of the Bay Minette exception (A.3.10.2).~~

[6] The Company has the discretion to apply rate increases by competitive Tier (e g , increase Tier II and/or Tier III but not Tier I or apply the authorized 1FR increases but not 1FB increases). Rates may also be decreased in one or more competitive sectors while increased in others. However, any unapplied increases will not be accumulated and applied at a later date.

[7] The maximum prices and time periods may be exceeded and/or adjusted if the Commission and BellSouth jointly agree to expand local calling areas in response to community-of-interest concerns and/or eliminate existing local calling exception areas.

Caller I.D. and Caller I.D. Deluxe will be capped for two years. Pricing Rules for Other Retail Telecommunication Services, Part 7B(4), shall apply for all other Business and Residential Vertical Services. Beginning with the second anniversary of the Plan, the pricing rules in 7B(4) shall thereafter apply to Residential Call Waiting, Caller I.D. and Caller I.D. Deluxe.

(4) OTHER RETAIL TELECOMMUNICATIONS SERVICES

Prices for other Retail Telecommunications Services shown in Attachment B (except as provided in Part 7B(3) and excluding Non-discretionary Retail Services) may be adjusted at the discretion of BellSouth subject to the following limitations:

a. Tier I increases shall be at the discretion of BellSouth.

b. Tier II increases shall be limited to fifteen percent (15%) annually per service for the first two years of the Plan. Beginning with the second anniversary of the Plan, Tier II increases shall be limited to twenty percent (20%) annually per service. Beginning with the fourth anniversary of the Plan, Tier II increases shall be limited to twenty-five percent (25%) annually per service.[8]

c. Tier III increases shall be limited to five (5%) annually per service for the first two years of the Plan. Beginning with the second anniversary of the Plan, Tier III increases shall be limited to ten percent (10%) annually per service. Beginning with the fourth anniversary of the Plan, Tier III increases shall be limited to fifteen percent (15%) annually per service.

C. Pricing Rules – Switched/Special Access Services and Local Access Services

(1) BellSouth's combination of the traffic sensitive per minute charge for originating and terminating switched access service will be capped[9] at the effective intrastate level (including any non-traffic sensitive rate elements) and special access charges capped at the intrastate~~interstate~~ level as of the date this Plan is implemented.

(2) No Commission-directed intrastate access reduction will occur unless the subsidy to non-bundled, existing traditional flat-rate local exchange services for residential service provided by switched access is replaced by an end user charge, an increase in local service rates (in addition to those provided for in Part 7B of this Plan), or by the introduction of an intrastate universal service fund. The establishment of an end user charge or an intrastate universal service fund will only occur following notice and hearing.

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[8] The percentage limitations specified in Section 7.B.(4)b. and c. shall not apply for any service priced at or below $4.00 per month or per use upon implementation of this Plan. Instead, the annual percentage limit for any service priced at or below $4.00 per month or per use shall be fifty percent (50%) until such time as the service is priced above $4.00 per month or per use.

[9] Excludes any access reductions associated with the USF High Cost Fund distribution, should it be eliminated or significantly reduced. The cap applies to intrastate switched access charges without application of subsidy from the USF High Cost Fund annual distribution.

(3) Regarding Local Access Services, the resale discount applicable to BellSouth's prices for standalone, regulated retail telecommunications services and terms, conditions, and prices for unbundled network elements will be formally reviewed and appropriately adjusted periodically following a hearing by the Commission. Further, BellSouth shall agree to abide by the Code of Conduct attached hereto as Attachment C.

8. CONTRACT SERVICE ARRANGEMENTS

A. Customer-specific contract service arrangements ("CSAs") may be offered by BellSouth to customers in Tier I[10] for any product or service provided by BellSouth and regulated by the Commission. CSAs may be offered by BellSouth to customers in Tier II and Tier III for any product or service provided by BellSouth and regulated by the Commission in response to a competitive alternative or other unique circumstances.[11] Rates, terms, conditions, and additional regulations, if applicable, for the CSA will be developed on an individual case basis and will include all relevant costs, plus an appropriate level of contribution. Unless otherwise specified, regulations applicable to a CSA are in addition to the applicable rates and regulations specified in BellSouth's tariffs.

B. On the fifth ~~w~~Work ~~d~~Day of each month, BellSouth will provide the Commission's Telecommunications Division, with a summary of the CSAs offered in the preceding calendar month. The summary will include the identification of the customer, the competitive Tier associated with the customer, a list of the services offered under the CSA, the retail price for each service from the tariff, the CSA price, a summary of TSLRIC support, and details about competitive alternatives if the CSA is offered in Tier II or Tier III. BellSouth will provide the CSA summary electronically via secure web page or other data storage medium. BellSouth will, as required, provide the Commission staff with access to detailed TSLRIC cost support for any CSA the staff chooses to review. BellSouth and the Attorney General agree to keep a comprehensive proprietary agreement in effect at all times to allow the Attorney General access to any proprietary/confidential information provided to the Commission's staff. All CSA information and supporting data is proprietary and will not be released to parties outside the Commission and Attorney General's Office without the written consent of the CSA customer and BellSouth.

C. The Commission retains authority to investigate CSAs. Should any CSA be found in non-compliance with the requirements of 8A to this Plan and/or to be priced below the TSLRIC price floor without the Commission's prior approval, the Commission may take

[10] If a CSA customer has locations in Tier I and TierII/Tier III, all of the locations will be treated as Tier I

[11] As previously referenced, the term "other unique circumstances" is defined as a unique customer telecommunications service requirement wherein a competitive alternative does not necessarily exist but the arrangement of products and/or services is generally unavailable in the approved tariff or wherein the Commission deems it to be in the public interest to offer the products and services at prices below those authorized in the approved tariff on a case-by-case basis.

remedial action to include suspending, for any period deemed appropriate by the Commission, the CSA provisions of this Plan for BellSouth.

9. PROMOTIONS, CUSTOMER VALUE PROGRAMS, MARKETING/TECHNICAL TRIALS, & BUNDLED SERVICES

A. General

The following rules apply to all Promotions, Customer Value Programs, Marketing/Technical Trials, and Bundled Service Offerings submitted for the Commission's consideration.

(1) Promotions, Customer Value Programs, Marketing/Technical Trials, and Bundled Service Offerings will be priced above TSLRIC. BellSouth will, as required, provide the Commission staff with access to detailed cost support for any of the above referenced offerings the staff chooses to review.

(2) For purposes of complying with the cost floor requirement, the Plan assumes a pro rata allocation[12] of the discount in retail price associated with the entire offering is applicable to the regulated services portion of the offering unless demonstrated otherwise to the Commission's satisfaction. The TSLRIC cost floor requirement is applicable only to services regulated by the Commission. Regulated services already priced at or below TSLRIC due to regulatory mandate (e.g., 1FR service) will be excluded from the cost floor limitation and the pro-rata discount allocation.

(3) A transmittal letter shall be provided to the Commission within five (5) ~~w~~Work ~~d~~Days following the effective date and will include the supporting documentation referenced in Parts 9B, 9C, 9D, and 9E.

(4) Additional cost support will, upon request, be submitted electronically to the Commission's Telecommunications Division under standing proprietary agreement to include:

a. TSLRIC for all regulated services included in Promotions, Customer Value Programs, Marketing/Technical Trials, and Bundled Service Offerings;

b. The stand-alone retail price (or package price if not marketed on a stand-alone basis) for both regulated and unregulated services.

(5) The Commission retains authority to investigate Promotions, Customer Value Programs, Marketing/Technical Trials, and Bundled Service Offerings. Should any be found in non-compliance with the requirements of Part 9 to this Plan and/or to be priced below the TSLRIC price floor without the Commission's prior approval, the Commission may take remedial action to include suspending, for any period deemed

[12] If, for example, the discount from the combined retail prices of both regulated and unregulated services is 20%, the discount applied to the retail price for regulated services is assumed to be 20% and the resulting discounted price must exceed the TSLRIC for those regulated services. In those cases where a contract exists between BellSouth and affiliated or non-affiliated providers of unregulated services that spells out the discount applicable to the non-regulated services, the Commission may use the contractual discounts for those non-regulated services in lieu of the pro rata allocation for its cost floor analysis.

appropriate by the Commission, the provisions of this Plan whereby BellSouth may offer Promotions, Customer Value Programs, Marketing/Technical Trials, and Bundled Service Offerings.

B. Promotions

Subject to the availability of products, services, and facilities, Promotions will be available to all subscribers meeting the eligibility criteria as set forth in the Promotion. The following supporting documentation must be provided for the promotion:

(1) A description of the Promotion (including terms, conditions and price);

(2) A description of the geographic area in which the Promotion will be offered;

(3) The eligibility criteria for the Promotion;

(4) The marketing period (beginning and ending dates);

(5) A detailed description of the services included in the Promotion; and,
(6) Availability for resale.

C. Customer Value Programs:

Customer Value Programs (CVPs) will be available on a non-discriminatory basis to all subscribers meeting the eligibility criteria for each Program. The following supporting documentation must be provided for the CVP:

(1) A description of the CVP (including terms, conditions and price);

(2) A description of the geographic area in which the CVP will be offered;

(3) The eligibility criteria for the CVP;

(4) The marketing period (beginning and ending dates); and,

(5) Availability for resale.

D. Marketing/Technical Trials

The following supporting documentation must be included must be provided for all Marketing/Technical Trials:

(1) A description of the parameters of the Trial (including terms and conditions);

(2) A description of the geographic area in which the Trial will be offered; and,

(3) The rates and charges for the Trial, including any applicable range of rates within which the rates may be increased or decreased.

Marketing/Technical Trials may be offered for not less than one (1) month or not more than twelve (12) months.

E. Bundled Services[13]

Subject to the availability of products, services, and facilities, Bundled Services will be available to all subscribers meeting the eligibility criteria for such Bundled Services. The services bundle must be made available to qualified customers, on a non-discriminatory basis, at their request.

The following supporting documentation must be provided for all Bundled Service offerings:

(1) A detailed description for each Bundled Service including whether the service is regulated or unregulated, terms, conditions, and the bundled price;

(2) A description of the geographic area in which the Bundled Service will be offered;

a. The eligibility criteria for the Bundled Service;

b. The marketing period (beginning and ending dates); and,

c. Availability for resale.

10. SERVICE QUALITY

A. ~~BellSouth will conform to the service standards outlined in Section T-21 of the Commission's Telephone Rules as currently exist or as subsequently modified.~~The Commission will monitor retail service quality as specified in Appendix D. ~~–~~BellSouth agrees to provide, electronically if feasible and on time, all data and reports required by the Commission Staff for monitoring and/or investigating wholesale and retail service performance. ~~Service quality data and/or reports will be addressed in a Commission Service Quality Workshop and the resulting requirements included as Attachment D (Service Quality).~~

~~B.If BellSouth fails to achieve the Commission's minimum service quality standards or otherwise fails to provide service deemed adequate and safe for the public, the Commission may, after notice and hearing, institute a probationary period for a length of time of the Commission's choosing during which BellSouth will be afforded an~~

[13] Existing rules and regulations, such as those involving bill payment, the allocation of payments between regulated and non-regulated services, and discontinuance of service for non-payment, remain in effect when customers subscribe to Bundled Services, unless and until modified by the Commission.

~~opportunity to achieve the Commission's requirements for service. Following the probationary period, if the Commission's service requirements are not achieved, the Commission may require BellSouth to credit customer bills for 1FR/1FB[14] service in affected wire centers each month until the Commission's service requirements are achieved. The amount of the credit shall not exceed 15% of the monthly 1FR/1FB rate and may be retroactive to the beginning of the probationary period.~~

~~C.~~B. As specified in Appendix D, BellSouth will collect and report the results of the retail service quality measures for a period of one year. Following analysis of the data, BellSouth and the Commission Staff will modify the performance measures if necessary to ensure that the measures are both relevant and effective. In addition, penalty provisions for sub-par performance will be addressed once the retail service quality performance measures are finalized.~~BellSouth will abide by all FCC and Commission rules and requirements, as currently exist, or as developed/modified on a going forward basis, for telephone number portability.~~

11. CUSTOMER NOTIFICATION

A. BellSouth will provide customer notification of any price increases to all affected customers either by bill message, bill insert or direct mail at the option of the Company at least seven (7) calendar days before any regulated prices are increased. Notice of a price increase shall include at a minimum the effective date of the price change(s)~~, the existing price(s),~~ and the new price(s).

B. Any affected customer may, within thirty (30) days of the Effective Date of any price increase, elect to cancel his/her subscription to a service that has been increased and BellSouth will credit the customer's bill by the amount of the price increase if the increase has been reflected on the customer's bill prior to the cancellation of the service.[15]

12. REPORTING & FILING REQUIREMENTS

A. BellSouth will comply with the Commission's filing requirements in either hard copy or electronic format (or both as directed by the Commission). BellSouth will provide web access to their Commission approved tariffs and an archive of previously approved tariff pages. Alternatively, BellSouth will submit to the Commission, within 5 ~~w~~Work D~~d~~ays from the effective date of tariff revisions, an updated electronic version of their entire tariff and an updated archive of previously approved tariff pages. The archive of previously approved tariff pages is for revisions beginning no later than the implementation date of this Plan.

[14] In addition to 1FR/1FB service, the credit applies to all other local calling plans. However, the amount of the credit applied to other local calling plans is based on the tariff rate for 1FR/1FB service.

[15] This provision shall not apply to customers who subscribe to BellSouth's service pursuant to a contract arrangement

B. On a monthly basis, BellSouth will report the number and type of access lines (residence/business) served in each wire center. Such information will be treated as proprietary.

C. On a monthly basis, BellSouth will report the customer name and location of pay phone service provider (PSP) and shared tenant service (STS) access lines served in each wire center.

D. The Commission shall address other specific reporting requirements for this Plan under a separate docket.

13. CUSTOMER COMPLAINT RESOLUTION

The Commission's existing customer complaint procedures shall remain in effect.

14. COMMISSION OVERSIGHT

A. The Alabama Telecommunications Regulation Plan ("ATRP") is hereby implemented by the Commission as an alternative method of regulating the telecommunications industry in Alabama pursuant to the provisions of Code of Alabama 1975, §37-1-80(b). Nothing in the Alabama Telecommunications Regulation Plan abrogates any statutorily granted authority of the Commission, including Code of Alabama, 1975 §37-1-80(a). The Commission reserves the right to exercise any authority statutorily granted to the Commission depending on the circumstances present in the telecommunications industry in Alabama. The Commission will, however, exercise any statutory provisions which are inconsistent with the ATRP only after notice and a hearing.

B. With the adoption of the ATRP, the Commission will remain actively involved in public interest concerns, the quality of services rendered and received, the availability of new services and technologies and other consumer oriented issues. However, nothing herein shall relieve regulated telecommunications carriers in Alabama from their ongoing obligation to provide financial cost or other related data that the Commission requires.

C. The Commission specifically reserves the right to review and/or revise the Alabama Telecommunications Regulation Plan in the event of rulings and/or decisions from the federal and/or state court systems as well as the Federal Communications Commission which have a major impact on the telecommunications industry in Alabama. Revisions to the ATRP will, however, only be implemented by the Commission following notice and a hearing. The determination of whether a ruling and/or decision shall be reviewed by the Commission for purposes of revising the ATRP or otherwise shall be made by the Commission on its own motion or following a petition seeking such a determination by an interested party.

15. EXPANDED ALTERNATIVE DISPUTE RESOLUTION PROCEDURES

Commission conducted/supervised Mediation shall be available to any telecommunications carrier subject to the jurisdiction of the Commission for purposes of resolving disputes with other carriers. Mediation is a dispute resolution mechanism primarily available for two-party disputes, and is not to be used in substitution of generic dockets or workshops absent express agreement of all parties. The purpose of mediation is to create a voluntary forum whereby the parties may, at their own option, openly communicate with each other with the goal of reaching resolution of issues between the parties. The Alabama Public Service Commission encourages such discussions and will work with the parties to facilitate the mediation.

The Rules governing Mediation as established herein are set forth in Attachment E. The Mediation of disputes arising as the result of negotiations instituted and conducted pursuant to § 252 of the Telecommunications Act of 1996 will continue to be addressed pursuant to Rule T-25 of the Commission's Telephone Rules.

16. COMMISSION REVIEW

The Commission will conduct an assessment of this Plan beginning with the first anniversary date of the Plan ~~in 2005~~ and will complete the assessment within one hundred and eighty (180) days following the first anniversary date. An additional assessment will be conducted, at the Commission's discretion, on the third anniversary date. The need for and frequency of future assessments will be determined at that time.

The Commission may not modify or repeal any portion of this Plan without notice and hearing. BellSouth or any affected third party may, as market conditions change, petition the Commission for modifications to this Plan. Modifications will only be made following notice and hearing by the Commission.

CLASSIFICATION OF BELLSOUTH'S WIRE CENTERS

Tier I MSAs

Birmingham-Hoover	Huntsville	Mobile	Montgomery
Alabaster	Athens Elk River	Airport	Fort Deposit
Bessemer Birmingport	Athens Main	Azalea	Dalraida
Bessemer Hueytown	Gurley	Bay Front	Holtville
Bessemer Main	Hazel Green	Belle Fontaine	Main & Toll
Cahaba Heights	Lakewood	Citronelle	Millbrook
Calera	Madison New Main	Mount Vernon	Normandale
Carbon Hill	Madison Old Main	Old Shell	Prattville
Center Point	Main & Toll	Prichard	Wetumpka
Centreville	Parkway	Saraland	
Chelsea	Redstone Arsenal	Semmes	
Clanton	Research West	Skyline	
Columbiana	Strategic Defense	Springhill	
Cordova	University	Theodore	
Dora			
Eastlake			
Eastwood			
Ensley			
Five Points			
Forestdale			
Gardendale			
Graysville			
Homewood			
Jasper			
Main & Toll			
Maplesville			
Montevallo			
Oak Mountain			
Oxmoor			
Parrish			
Pinson			
Riverchase			
Tarrant			
Valley			
Vincent			
Warrior			
West Blocton			
West End			
Woodlawn			

CLASSIFICATION OF BELLSOUTH'S WIRE CENTERS

Tier II MSAs

Anniston	Auburn	Columbus	Decatur
Jacksonville	Auburn	Hurtsboro	Courtland
Lenlock	Opelika	Phoenix City Fort Mitchell	Decatur
Main & Toll		Phoenix City Main	Hartselle Main
Ohatchee			Hartselle Pence
Oxford			Moulton
Piedmont			Towncreek

Florence	Gadsden	Pensacola	Tuscaloosa
Florence	Attalla	Flomaton	Bessemer Bucksville
Killen	Boaz		Druid Hill
Leighton	Hillside		Eutaw Boligee
Lexington	Main & Toll		Eutaw Main
Rogersville	Rainbow Drive		Greensboro
Sheffield			Northport
			Tuscaloosa Main

Non-MSA Areas

Albertville	Fairhope	Red Bay
Alexander City	Fort Payne	Russellville
Bay Minette	Goodwater	Selma
Brewton	Guntersville	Spanish Fort
Bridgeport	Hanceville Bremen	Stevenson
Childersburg	Hanceville Main	Sylacauga
Clayton	Jackson	Talladega Main
Cullman Fairview	Lafayette	Talladega Renfro
Cullman Jones Chapel	Linden	Thomasville
Cullman Main	Livingston	Troy
Dadeville	Marion	Tuskegee
Demopolis	McIntosh	Uniontown
Eufaula	Munford	York
Evergreen		

CLASSIFICATION OF SERVICES BY CATEGORY

Retail Services

A2	**General Regulations**		**Non-discretionary**
A3	Basic Local Exchange Service		
	A3.2.1	Flat Rate Residence and Business Service	
	A3.2.9	Area Calling Service	
	A3.2.10	Complete Choice® Service	
	A3.10.2	Bay Minette Exception	
	A3.10.3	Bridgeport Exception	
	A3.10.4	Reverse Billing Option (Bridgeport)	
	A3.2.11	Area Plus® Service	
	A3.7	Measured Rate Service	
	A3.12	NAR Usage Packages	
	A3.13.3	Directory Assistance Service	
	A3.14.3	Local Operator and Calling Card Service	
	A3.15	Local Operator Verification/Interruption Service	
	A3.19	Grouping Service	
	A3.20	Trunk Lines	
	A3.24	Directory Assistance Call Completion Service	
	A3.25	Directory Assistance/Directory Assistance Call Completion Service	
	A3.26	Network Access Service	
	A3.27	Trunk Side Access Facility	
	A3.30	Exchange Access Premium Charge	
	A3.31	**Lifeline**	**Non-discretionary**
	A3.32	Classroom Communication Service	
	A3.38	Back-Up Line Service	
	A3.43	BellSouth Business Plus Service	
	A3.45	Complete Choice® for Business Package	
A4	Service Charges		
	A4.2.7	Installment Billing	
	A4.3	Residence and Business Service Charges	
	A4.4	Dual Service	
	A4.7	**Link-Up**	**Non-discretionary**
A5	Charges Applicable Under Special Conditions		
A6	Directory Listings		
A8	Telephone Answering Service Facilities		
A9	Foreign Exchange Service & Foreign Central Office Service		
A12	Central Office Non-Transport Offerings		
	A12.4	Assigned Centrex Type Services Telephone Numbers Without Facilities	
	A12.7	Direct-Inward Dialing Service	
	A12.8	Identified-Outward Dialing From PBX Systems	
	A12.16	Prestige® Communications Service	
	A12.20	MultiServ® Service	
	A12.21	MultiServ® Plus Service	
	A12.22	MultiServ® Multi-Account Service	
	A12.25	BellSouth® Centrex Service	
	A12.26	BellSouth® Centrex ISDN Service	
A13	Miscellaneous Service Arrangements		
	A13.5	Arrangements for Night, Sunday and Holiday Service	
	A13.9	Custom Calling Service Call Waiting and Call Waiting Deluxe (all) Call Forwarding Variable, Call Forwarding Busy Line, Call Fwd Don't Ans with or w/o ring control	
	A13.11	Remote Call Forwarding	
	A13.12	Selective Class of Call Screening Service	

A13.13	Dormitory Communications Service	
A13.14	Toll Trunks	
A13.16	Local Calling Area Conference Service	
A13.17	Feature Packages	
A13.19	TouchStar® Service Caller ID Basic, Caller ID Deluxe with or without ACR and Enhanced Caller ID	
A13.20	Call Screening and Restriction Services	
A13.25	Extension Line Channels	
A13.27	**Emergency Reporting Services**	**Non-discretionary**
A13.30	Automatic Time and Charge Reporting Service	
A13.34	Ringmaster® Service	
A13.46	SMDI	
A13.47	Message Waiting Indication	
A13.49	Surrogate Client Number	
A13.50	Telecommunications Service Priority System	
A13.51	Electronic White Pages	
A13.53	Multiline Hunt Queuing	
A13.56	Hot Line Service	
A13.57	Warm Line Service	
A13.58	Uniform Access Number	
A13.59	Automatic Number Identification	
A13.60	Custom Service Area	
A13.61	Answer Supervision	
A13.62	Call Detail Information	
A13.70	BellSouth® Privacy Director® Service	
A13.72	Inter-Switch SMDI	
A13.76	Internet Call Waiting Service	
A13.77	Voice Mail Companion Services Package	
A13.78	BellSouth Essentials Package	
A13.79	**211 Dialing Service**	**Non-discretionary**
A13.80	**711 Dialing Code for TRS**	**Non-discretionary**
A13.81	**511 Dialing Service**	**Non-discretionary**

A14 Auxiliary Equipment

A15 Connections With Certain Facilities and/or Equipment Of Others

A18 Long Distance Message Telecommunications Service

A19 Wide Area Telecommunications Service

A20 Optional Calling Plans

A29 Data Transport Service

A32 Integration Plus Management Services

A34 Advanced Intelligent Network Services

A37 Billing and Collection Services

A38 Listing Services

A40 Fast Packet Transport Services

A42 ISDN

A43 Channelized Voice Transport Services

A47 BellSouth® Remote Access Service

A103 Obsolete Service Offerings – Basic Local Exchange Services

A108 Obsolete Service Offerings – Telephone Answering Service Facilities

A111 Obsolete Service Offerings – ESSX-1 Service

A112 Obsolete Service Offerings – Central Office Non-Transport Services

A113	Obsolete Service Offerings – Miscellaneous Service Arrangements
A120	Obsolete Service Offerings – Optional Calling Plans
A123	Obsolete Service Offerings – ESS Central Office Features
A125	Obsolete Service Offerings - Lightgate® Digital Service
A126	Obsolete Service Offerings – Exchange Digital Services
A129	Obsolete Service Offerings – Data Transport Service
A131	Obsolete Service Offerings – Multi-Location Business Service
A134	Obsolete Service Offerings – AIN Services
A139	Obsolete Service Offerings – Abbreviated Dialing
A140	Obsolete Service Offerings – Fast Packet Transport Services
A142	Obsolete Service Offerings – ISDN
B3	Channels
B4	Equipment
B7	Digital Network Services
B8	Custom Network Service
B103	Obsolete Service Offerings – Channels
B104	Obsolete Service Offerings – Equipment
B107	Obsolete Service Offerings – Digital Network Services

Interconnection Services

A7	Coin Telephone Service
A35	Interconnection of Mobile Services
E3	Carrier Common Line Access Service
E5	Ordering Options for BellSouth SWA and Special Access Service
E6	BellSouth SWA Service
E7	Special Access Service
E8	Billing and Collection Services
E9	BellSouth Directory Assistance Access Service
E18	Operator Services Access Services
E20	Expanded Interconnection Service
E21	Fast Packet Access Service
E34	Advanced Intelligent Network Service

560200

EXHIBIT B

DOCKET 28590
ATTACHMENT D

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

General

1. Focus:
   a. The service quality monitoring program, like the Alabama Telecommunications Regulatory Plan it supports, recognizes that competition is evolving in the local exchange market. Business services experience the highest degree of competitive activity and the Sstaff anticipates that market forces are sufficient to ensure high quality business telephone service. Residential service is less competitive than the business market. Therefore, the sStaff will, for the most part, focus its time and resources on monitoring telephone service quality in the residential telecommunications market.
   b. Furthermore, the Sstaff recognizes that smaller LECs do not possess the resources to provide the data required under this program as frequently as do larger LECs. Consequently, LECs with less than 100K access lines, though subject to the same level of detail as those with 100K or more access lines, will have a somewhat less stringent reporting requirement.

~~2.~~First Year, Pilot Program: Staff and company representatives recognize that statistical measures, which are dissimilar to those used previously for service quality measurements, are extremely difficult to establish without a solid historical record. Therefore, all parties agree that data will be collected and reported for one-year, at which time, Sstaff and utility personnel who participated in this workshop will reconvene to modify the performance measures as necessary to ensure that statistical measures are both relevant and effective. Staff will report to the Commission the results of the service quality performance measures during the pilot program. Once permanent service quality performance measures are established, the Commission will, following notice and hearing, determine if penalty provisions for sub-par performance should be incorporated into the service quality monitoring program. ~~However, the service quality penalty provisions of the Alabama Telecommunications Regulatory Plan will not be applicable until permanent service quality performance measures are established following the first anniversary of the Plan.~~

~~3.~~

~~3.2.Broadband Infrastructure Deployment Status/Plans: Facilities-based LECs will report, semi-annually by ILEC wire center, the existing percentage of subscriber lines for which broadband service is being provided, the percentage of subscriber lines that are capable of broadband service (meet distance criteria to end office or RTU) within a 30-day period following a customer request for broadband access, and the estimated percentage of~~

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

~~subscriber lines that will be broadband capable by the end of the succeeding 6-month report period.~~

3. Reporting Format: In order to facilitate review of service quality data, format provided in the attached example Excel spreadsheet shall be used by the reporting companies. The spreadsheet contains examples using a partial list of BellSouth wire centers.

   Companies shall report data as prescribed in the tabs labeled "Res Lines-in-Service" through the tab labeled "Combined Bus Ofc & Repair." The tabs labeled "Res Bus Ofc," "Res Repair Call Center," and "Combined Bus Ofc & Repair" shall be used as appropriate for the reporting companies. Depending on the organizational structure, companies shall report either separate data for the residential business office and the residential repair call center, or combined results for the residential business and repair office.

   The tabs starting with "Total Lines-in-Service" are calculated quantities resulting from the reported data units and are designed to quantify objective measures as prescribed in this Appendix.

4. Commission Review: Staff anticipates that competition for residential customers in Tier 1 and Tier 2 wire centers will eventually increase to the point that market forces will be sufficient to regulate telephone service quality. Consequently, any subsequent Commission review of the overall regulatory plan should also include a review of the wire centers for which this service quality monitoring will be remain applicable. In addition, subsequent reviews should also include an assessment of whether wire center detail is necessary.

Access Line Activity Report

1. Applicability: Applicable only to ILECs and CLECs who provide service via their own switch (excludes resale and service provided exclusively by UNE-P).

2. Purpose:
   a. Identifies wire center and wire center location
   b. Identifies basic service business and residential line growth

3. Proprietary data: Proprietary.

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

4. Reporting Frequency: Monthly for previous calendar month's activity.

5. Due: No later than the last work day of the month (e.g., data for October due NLT than the last work day in November).

6. Comments: CLECs will identify the ILEC exchange(s) (e.g., Birmingham exchange, Mobile exchange, etc.) associated with customers served by their switches. For switches serving customers multiple ILEC exchanges, CLECs will separate and report by ILEC exchange.

7. Applicable performance measures: N/A

8. If a company reports lines to the FCC on Form 477, the line counts reported here should conform to the methodology used for reporting retail lines on Form 477.

Residential Installations Report

1. Applicability: Applicable only to ILECs and CLECs who provide service via their own switch (excludes resale and service provided exclusively by UNE-P).

2. Purpose: Identifies response time for residential installations.

3. Proprietary data: Proprietary.

4. Reporting Frequency:
   a. Monthly for companies with 100K or > total access lines.
   b. Quarterly (but separated into monthly results) for companies with < 100K total access lines.

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

5. Due: No later than the last work day of the month following the end of the applicable report period (e.g., for companies reporting monthly, data for October due NLT the last work day in November; for companies reporting quarterly, data for JAN-MAR due NLT the last work day in April).

6. Comments: Working days only (excludes weekends and holidays). Excludes customer-requested due dates that exceed 5 working days.

7. Applicable performance measures: N/A for first year. Until permanent service quality performance measures are established, the Staff will, for information purposes, compare reported results as follows: Using 12-month rolling average, ninety percent (90%) or greater of installations completed within 5 working days (120 working hours) after customer request for service is received.

Held Applications Report

1: Applicability: Applicable only to ILECs and CLECs having ETC status and who provide service via their own switch (excludes resale and service provided exclusively by UNE-P).

2. Purpose: Identifies customers who have requested and are awaiting basic service or relocation of existing basic service.

3. Proprietary data: Proprietary.

4. Reporting Frequency: Monthly.

5. Due: No later than the last work day of the month (e.g., data for October due NLT the last work day in November).

6. Comments: None.

7. Applicable performance measures: N/A

DOCKET 28590
ATTACHMENT D

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

Troubles Report

1. Applicability: Applicable only to ILECs and CLECs who provide service via their own switch (excludes resale and service provided exclusively by UNE-P).

2. Purpose: On a wire center basis,
   a. Identifies total residential and business network troubles (troubles found in the wire, cable, or central office portions of the network).
   b. Identifies out-of-service troubles.
   c. Identifies repeat troubles.

3. Proprietary data: Proprietary.

4. Reporting Frequency: Monthly.

5. Due: No later than the last work day of the month (e.g., data for October due NLT the last work day in November).

6. Comments:
   a. "Total Network Trouble Reports" consists of **ALL**~~ customer reported,~~ network related troubles for non-design lines beginning with the central office through the customer NID (excludes inside wiring at customer's premises).
   b. "Repeat Troubles" are identified as a customer reported network trouble for the same line that a previous customer reported trouble was received within the previous 30-day period.
   c. "~~Average Access~~ Lines-in-Service" consists of working~~total~~ residential and business non-design access lines in service at the end of the calendar month.~~for the beginning of the report period plus the total residential and business access lines for the end of the report period (Access Lines Activity Report Column J + Column K) divided by two~~.
   d. "Out-of-Service Network Troubles" consists of ~~all~~network customer reports that an out-of-service condition exists for their line or lines. A customer trouble report that multiple lines are out-of-service for that customer at the same location and at the same time constitutes a single out-of-service report.~~ A Customer trouble report that multiple lines are out-of-service that for that customer, at the same location and at the same time, constitutes a single out-of-service report.~~
   e. "Percent Repeat Trouble" and "Percent Out-of-Service ~~t~~Trouble" rates are expressed as a percentage of Total Trouble Reports.

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

f. NOTE: The Commission will monitor trouble reports, repeat troubles, and out-of-service troubles on a monthly basis but for purposes of applying performance measures, the data will be compiled into 12-month rolling averages to reduce seasonal spikes. For example, the total troubles for the most recent month will be added to those for the previous 11 months and divided by the cumulative average access lines reported for the same period. Force Majeure may be requested on a case-by-case basis for wire centers affected by severe anomalies such as hurricanes, tornados, floods, or unusually severe ice/snow storms. Heavy periods of precipitation are not considered anomalies.

7. Applicable performance measures: N/A for first year. Until permanent service quality performance measures are established, the Staff will, for information purposes, compare reported results as follows:
   a. Trouble report rate
      i. Wire centers with 10K or more lines
         1. Exception Threshold (trigger when monthly wire center trouble report rates by disposition code are required): Rolling t~~T~~welve month trouble report rate of 3.75 reports per 100 non-design access lines~~%~~ or higher or when any monthly trouble rate exceeds 7.5 reports per 100 non-design access lines~~%~~.
         2. Minimum acceptable performance: Rolling t~~T~~welve month trouble report rate of 5.00 reports per 100 non-design access lines~~%~~ or less.
      ii. Wire centers with ~~1000 or more lines but~~ less than 10K lines
         1. Exception Threshold (trigger when monthly wire center trouble report rates by disposition code are required): Rolling t~~T~~welve month trouble report rate of 5.25 reports per 100 non-design access lines~~%~~ or higher or when any monthly trouble rate exceeds 10.5 reports per 100 non-design access lines~~%~~.
         2. Minimum acceptable performance: Rolling t~~T~~welve month trouble report rate of 7.00 reports per 100 non-design access lines~~%~~ or less.
      ~~iii. Wire centers with less than 1000 lines~~
         ~~1.Exception Threshold (trigger when monthly wire center trouble report rates by disposition are required): Twelve month trouble report rate of 6.75% or higher or when any monthly trouble rate exceeds 13.5%.~~
         ~~2.Minimum acceptable performance: Twelve month trouble report rate of 9.0% or less.~~

DOCKET 28590
ATTACHMENT D

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

b. Repeated Trouble report rate
   i. Wire centers with 10K or more lines
      1. Exception Threshold (trigger when monthly wire center trouble report rates by disposition code are required): Rolling t~~T~~welve month repeated trouble percentage~~report rate~~ of 20 percent~~6.0%~~ or higher or when any monthly repeated trouble percentage~~rate~~ exceeds 30 percent~~12.0%~~.
      ~~2.Minimum acceptable performance: Twelve month repeated trouble report rate of 8.0% or less.~~
   ii. Wire centers with ~~1000 or more lines but~~ less than 10K lines
      ~~1.~~Exception Threshold (trigger when monthly wire center trouble report rates by disposition code are required): Rolling t~~T~~welve month repeated trouble percentage~~report rate~~ of ~~9~~25.0% or higher or when any monthly repeated trouble percentage~~rate~~ exceeds 35~~18~~.0%.
      ~~2.Minimum acceptable performance: Twelve month repeated trouble report rate of 12.0% or less.~~
   ~~iii. Wire centers with less than 1000 lines~~
      ~~1.Exception Threshold (trigger when monthly wire center trouble report rates by disposition are required): Twelve month repeated trouble report rate of 12.0% or higher or when any monthly repeated trouble rate exceeds 24.0%. Minimum 5 repeat troubles must be recorded before the monthly exception threshold of 24% applies.~~
      ~~2.~~1.~~Minimum acceptable performance: Twelve month repeated trouble report rate of 16.00% or less.~~

c. Out-of-Service (OOS) report rate: N/A

DOCKET 28590
ATTACHMENT D

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

Troubles (Exceptions) Report

1. Applicability:
   a. Applicable only to ILECs and CLECs that provide service via their own switch (excludes resale and service provided exclusively by UNE-P).
   b. **ILECs/CLECs with less than 100K total access lines will maintain the data requirements in a form readily accessible and available for Commission staff review (i.e., that allows us to build the exceptions report, in a reasonable period of time from records maintained by the company on its premises within the state of Alabama).**

2. Purpose: Submitted when 12-month exception and/or monthly threshold identified for the Troubles Report is exceeded. Separates troubles into disposition.

3. Proprietary data: Proprietary.

4. Reporting Frequency: Monthly.

5. Due: No later than the last work day of the month (e.g., data for October due NLT the last work day in November).

Residential Repair Response Report

1. Applicability: Applicable only to ILECs and CLECs who provide service via their own switch (excludes resale and service provided exclusively by UNE-P).

2. Purpose: Identifies repair response for out-of-service troubles and non out-of-service trouble.

3. Proprietary data: Proprietary.

4. Reporting Frequency: Monthly

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

5. Due: No later than the last work day of the month (e.g., data for October due NLT the last work day in November).

6. Comments:
   a. The 36-hour and 72-hour periods include work day~~include~~ business and non-business hours (i.e., weekends and holidays are excluded).
   b. The time required for clearing the OOS or non-OOS service begins when the report is initiated by the customer, not when it is received by dispatch or repair personnel and ends when repair personnel report that service is restored and/or the trouble is cleared.
   c. Excludes customer-requested appointments that exceed target hours.

7. Applicable performance measures: N/A for first year. Until permanent service quality performance measures are established, the Staff will, for information purposes, compare reported results as follows:
   a. Using 12-month rolling average, 80% or greater OOS troubles cleared in 36 hours or less.
   b. Using 12-month rolling average, 80% or greater non-OOS troubles cleared in 72 hours or less.

ANS Time Report

1. Applicability: Applicable to all ILECs and CLECs with 100K or > total access lines.

2. Purpose: Indicates distribution of live attendant answer times for calls by residential customers to the Business and Repair Office. The number of calls handled by automated means and Web-based transactions will also be tabulated.

3. Proprietary data: N/A

4. Reporting Frequency: Monthly.

5. Due: No later than the last work day of the month (e.g., data for October due NLT the last work day in November).

Alabama Public Service Commission
Telephone Service Quality Reporting
Narrative

6. Comments: A company will report residential business office data and residential repair call center data separately, where available. For those companies that have call centers with combined business office and repair functions, the data may be combined.~~N/A~~

7. Applicable performance measures: N/A.

Customer Satisfaction Surveys

To be discussed.

560198

EXHIBIT C

Residential Line Activity

Company Name: BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Business Line Activity

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Non-design Service Orders Report

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Non-design Installations < 5 Days

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Non-design Installations > 5 days - Customer Requested

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Non-design Lines In-Service

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

RESIDENTIAL ORDERS > 30 DAYS OLD

BST

Wire Center Name	Customer Name	Customer Address	Date Application Received	Reason for Delay	Estimated Date of Completion	Additional Notes

Residential Non-design Total Network Troubles

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Non-design Out of Service Network Troubles

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Network Out of Service Troubles Cleared within 36 Hours

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Network Total Non Out of Service Troubles

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Network Non Out of Service Troubles Cleared within 72 Hours

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Residential Non-design Repeat Network Troubles

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Business Non-design Lines In-Service

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Business Non-design Total Network Troubles

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Business Non-design Out of Service Network Troubles

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Business Non-design Repeat Network Troubles

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER												
ALCYALMT	ALEX CITY												
ALVLALMA	ALBERTVILLE												
ANTNALLE	ANNISTON-LENLOCK												
ANTNALMT	ANNISTON-M&T												
ANTNALOX	ANNISTON-OXFORD												
ATHNALER	ATHENS-ELK RIVER												
ATHNALMA	ATHENS-MAIN												
ATTLALNM	ATTALLA												
AUBNALMA	AUBURN												
BLFNALMA	BELLE FONTAINE												
BOAZALMA	BOAZ												
BRHMALCH	BHAM-CAHABA HGTS												

Submitted when any wire center exceeds the 12-month and/or monthly thresholds identified for the Troubles Report

BST

				REPORT RATES		OUT-OF-SERVICE		BY DISPOSITION										
Wire Center	Network Trouble Reports Received During Period	Repeat Trouble Reports Received During Period	Res Non-design Lines In-service for Report Period	Trouble Report Rate	Network Repeated Trouble Report Rate	Network Out-of-Service Troubles	Percent Troubles Out-of-Service	Percent COE	Percent Cable	Percent Cut Cable	Percent Carrier or other OSP Electronic Equipment	Percent Terminal or Pedastal related	Percent Drop	Percent Customer NID	Percent Customer Wiring	Percent Trouble Not Found	Percent Tested OK Found OK	Percent Other

Residential Business Office Answertime

Company Name | BST

	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
Live Calls Answered												
0 to 30 SEC												
31 to 60 SEC												
61 to 90 SEC												
> 90 SEC												
Total Calls Answered												
Average Speed of Answer for Live Calls												
IVR Transactions												
Web Transactions												
Average Speed of Answer for all Transactions												

Residential Repair Call Center Answertime

Company Name | BST

	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
Live Calls Answered												
0 to 30 SEC												
31 to 60 SEC												
61 to 90 SEC												
> 90 SEC												
Total Calls Answered												
Average Speed of Answer for Live Calls												
IVR Transactions												
Web Transactions												
Average Speed of Answer for all Transactions												

Residential Combined Busienss Office & Repair Call Center Answertime

Company Name | BST

	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
Live Calls Answered												
0 to 30 SEC												
31 to 60 SEC												
61 to 90 SEC												
> 90 SEC												
Total Calls Answered												
Average Speed of Answer for Live Calls												
IVR Transactions												
Web Transactions												
Average Speed of Answer for all Transactions												

Total Line Activity

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER	0	0	0	0	0	0	0	0	0	0	0	0
ALCYALMT	ALEX CITY	0	0	0	0	0	0	0	0	0	0	0	0
ALVLALMA	ALBERTVILLE	0	0	0	0	0	0	0	0	0	0	0	0
ANTNALLE	ANNISTON-LENLOCK	0	0	0	0	0	0	0	0	0	0	0	0
ANTNALMT	ANNISTON-M&T	0	0	0	0	0	0	0	0	0	0	0	0
ANTNALOX	ANNISTON-OXFORD	0	0	0	0	0	0	0	0	0	0	0	0
ATHNALER	ATHENS-ELK RIVER	0	0	0	0	0	0	0	0	0	0	0	0
ATHNALMA	ATHENS-MAIN	0	0	0	0	0	0	0	0	0	0	0	0
ATTLALNM	ATTALLA	0	0	0	0	0	0	0	0	0	0	0	0
AUBNALMA	AUBURN	0	0	0	0	0	0	0	0	0	0	0	0
BLFNALMA	BELLE FONTAINE	0	0	0	0	0	0	0	0	0	0	0	0
BOAZALMA	BOAZ	0	0	0	0	0	0	0	0	0	0	0	0
BRHMALCH	BHAM-CAHABA HGTS	0	0	0	0	0	0	0	0	0	0	0	0

% Res Installations LT 5 Days

Company Name: BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALCYALMT	ALEX CITY	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALVLALMA	ALBERTVILLE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALLE	ANNISTON-LENLOCK	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALMT	ANNISTON-M&T	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALOX	ANNISTON-OXFORD	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALER	ATHENS-ELK RIVER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALMA	ATHENS-MAIN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATTLALNM	ATTALLA	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
AUBNALMA	AUBURN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BLFNALMA	BELLE FONTAINE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BOAZALMA	BOAZ	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BRHMALCH	BHAM-CAHABA HGTS	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

% Res & Bus OOS

Company Name: BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALCYALMT	ALEX CITY	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALVLALMA	ALBERTVILLE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALLE	ANNISTON-LENLOCK	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALMT	ANNISTON-M&T	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALOX	ANNISTON-OXFORD	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALER	ATHENS-ELK RIVER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALMA	ATHENS-MAIN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATTLALNM	ATTALLA	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
AUBNALMA	AUBURN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BLFNALMA	BELLE FONTAINE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BOAZALMA	BOAZ	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BRHMALCH	BHAM-CAHABA HGTS	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

% Res & Bus Repeat

Company Name: BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALCYALMT	ALEX CITY	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALVLALMA	ALBERTVILLE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALLE	ANNISTON-LENLOCK	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALMT	ANNISTON-M&T	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALOX	ANNISTON-OXFORD	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALER	ATHENS-ELK RIVER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALMA	ATHENS-MAIN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATTLALNM	ATTALLA	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
AUBNALMA	AUBURN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BLFNALMA	BELLE FONTAINE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BOAZALMA	BOAZ	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BRHMALCH	BHAM-CAHABA HGTS	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

% Res & Bus Network Trouble Reports per 100 Lines

Company Name: BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALCYALMT	ALEX CITY	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALVLALMA	ALBERTVILLE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALLE	ANNISTON-LENLOCK	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALMT	ANNISTON-M&T	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALOX	ANNISTON-OXFORD	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALER	ATHENS-ELK RIVER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALMA	ATHENS-MAIN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATTLALNM	ATTALLA	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
AUBNALMA	AUBURN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BLFNALMA	BELLE FONTAINE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BOAZALMA	BOAZ	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BRHMALCH	BHAM-CAHABA HGTS	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

% Res OOS Cleared within 36 Hours

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALCYALMT	ALEX CITY	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALVLALMA	ALBERTVILLE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALLE	ANNISTON-LENLOCK	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALMT	ANNISTON-M&T	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALOX	ANNISTON-OXFORD	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALER	ATHENS-ELK RIVER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALMA	ATHENS-MAIN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATTLALNM	ATTALLA	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
AUBNALMA	AUBURN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BLFNALMA	BELLE FONTAINE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BOAZALMA	BOAZ	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BRHMALCH	BHAM-CAHABA HGTS	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

% Res Non OOS Cleared within 72 Hours

Company Name BST

Wirecenter CLLI	Wirecenter Name	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04
ALBSALMA	ALABASTER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALCYALMT	ALEX CITY	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ALVLALMA	ALBERTVILLE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALLE	ANNISTON-LENLOCK	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALMT	ANNISTON-M&T	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ANTNALOX	ANNISTON-OXFORD	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALER	ATHENS-ELK RIVER	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATHNALMA	ATHENS-MAIN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
ATTLALNM	ATTALLA	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
AUBNALMA	AUBURN	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BLFNALMA	BELLE FONTAINE	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BOAZALMA	BOAZ	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
BRHMALCH	BHAM-CAHABA HGTS	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!