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BellSouth Telecommunications, Inc
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Nashville, TN 37201-3300

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T.R.A. DOCKET ROOM

Guy M. Hicks
General Counsel

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July 22, 2004

VIA HAND DELIVERY

Hon. Pat Miller
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

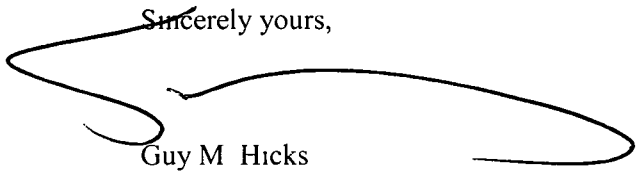
Re: *Approval of the Amendment to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc. and Preferred Carrier Services, Inc. Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*
Docket No. 04-00224

Dear Chairman Miller,

Pursuant to Section 252(e) of the Telecommunications Act of 1996, Preferred Carrier Services, Inc. and BellSouth Telecommunications, Inc. are hereby submitting to the Tennessee Regulatory Authority the original and fourteen copies of the attached Petition for Approval of the Amendment to the Interconnection Agreement dated November 27, 2002. The Amendment adds Melded Tandem Switching to the Agreement.

Thank you for your attention to this matter.

Sincerely yours,


Guy M. Hicks

cc General Counsel, Preferred Carrier Services, Inc

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In re: *Approval of the Amendment to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc. and Preferred Carrier Services, Inc Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*

Docket No. _____

PETITION FOR APPROVAL OF THE
AMENDMENT TO THE INTERCONNECTION AGREEMENT
NEGOTIATED BETWEEN BELL SOUTH TELECOMMUNICATIONS, INC.
AND PREFERRED CARRIER SERVICES, INC.
PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996

COME NOW, Preferred Carrier Services, Inc. ("Preferred") and BellSouth Telecommunications, Inc., ("BellSouth"), and file this request for approval of the Amendment to the Interconnection Agreement dated November 27, 2002 (the "Amendment") negotiated between the two companies pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, (the "Act"). In support of their request, Preferred and BellSouth state the following:

1. Preferred and BellSouth have successfully negotiated an agreement for interconnection of their networks, the unbundling of specific network elements offered by BellSouth and the resale of BellSouth's telecommunications services to Preferred. The Interconnection Agreement was approved by the Tennessee Regulatory Authority ("TRA") on February 3, 2003.

2. The parties have recently negotiated an Amendment to the Agreement which adds Melded Tandem Switching to the Agreement. A copy of the Amendment is attached hereto and incorporated herein by reference.

3. Pursuant to Section 252(e) of the Telecommunications Act of 1996, Preferred and BellSouth are submitting their Amendment to the TRA for its consideration and approval. The Amendment provides that either or both of the parties is authorized to submit this Amendment to the TRA for approval.

4. In accordance with Section 252(e) of the Act, the TRA is charged with approving or rejecting the negotiated Amendment between BellSouth and Preferred within 90 days of its submission. The Act provides that the TRA may only reject such an agreement if it finds that the agreement or any portion of the agreement discriminates against a telecommunications carrier not a party to the agreement or the implementation of the agreement or any portion of the agreement is not consistent with the public interest, convenience and necessity.

5. Preferred and BellSouth aver that the Amendment is consistent with the standards for approval

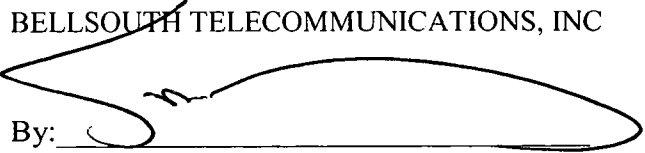
6. Pursuant to Section 252(i) of the Act, BellSouth shall make the Agreement available upon the same terms and conditions contained therein.

Preferred and BellSouth respectfully request that the TRA approve the Amendment negotiated between the parties.

This 22nd day of July, 2004.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC

By: 

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301
Attorney for BellSouth

**Amendment to the Agreement
Between
Preferred Carrier Services, Inc.
And Preferred Carrier Services, Inc. d/b/a Telefonos Para Todos
and d/b/a Phones for All in Florida
and
BellSouth Telecommunications, Inc.
Dated November 27, 2002**

Pursuant to this Amendment, (the "Amendment"), Preferred Carrier Services, Inc and Preferred Carrier Services, Inc d/b/a Telefonos Para Todos and d/b/a Phones for All in Florida ("Preferred"), and BellSouth Telecommunications, Inc ("BellSouth"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Interconnection Agreement between the Parties dated November 27, 2002 ("Agreement") to be effective thirty (30) calendar days after the date of the last signature executing the Amendment

WHEREAS, BellSouth and Preferred entered into the Agreement on November 27, 2002, and,

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby covenant and agree as follows

- 1 The parties agree to add the following provision to Attachment 2, Section 4.3 and the associated rates as set forth in Exhibit 1 of this Amendment, attached hereto and incorporated herein by this reference

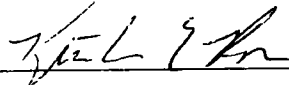
4.3.1.1 Where Preferred utilizes portions of the BellSouth network in originating or terminating traffic, the Tandem Switching rates are applied in call scenarios where the Tandem Switching Network Element has been utilized. Because switch recordings cannot accurately indicate on a per call basis when the Tandem Switching Network Element has been utilized for an interoffice call originating from a UNE port and terminating to a BellSouth, Independent Company or Facility-Based CLEC office, BellSouth has developed, based upon call studies, a melded rate that takes into account the average percentage of calls that utilize Tandem Switching in these scenarios. BellSouth shall apply the melded Tandem Switching rate for every call in these scenarios. BellSouth shall utilize the melded Tandem Switching Rate until BellSouth has the capability to measure actual Tandem Switch usage in each call scenario specifically mentioned above, at which point the rate for the actual Tandem Switch usage shall apply. The UNE Call Flows set forth on BellSouth's website, as amended from time to time and incorporated herein by this reference, illustrate when the full or melded Tandem Switching rates apply for specific scenarios.

- 2 All of the other provisions of the Agreement, dated November 27, 2002, shall remain in full force and effect

- 3 Either or both of the Parties are authorized to submit this Amendment to the respective state regulatory authorities for approval subject to Section 252(e) of the Federal Telecommunications Act of 1996

IN WITNESS WHEREOF, the Parties have executed this Agreement the day and year written below

BellSouth Telecommunications, Inc.

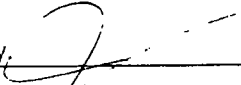
By 

Name Kristen E Rowe

Title Director

Date 6/15/04

**Preferred Carrier Services, Inc. and Preferred
Carrier Services, Inc. d/b/a Telefonos Para Todos
and d/b/a Phones for All in Florida ("Preferred")**

By 

Name

Alex Valencia

Title

Vice President of Regulatory Affairs

Date

June 15, 2004

[illegible]

[illegible]

[illegible]

AMENDMENT EXHIBIT 1

[illegible]

UNBUNDLED NETWORK ELEMENTS - Mississippi

Version 3Q03 11/12/2003

UNBUNDLED NETWORK ELEMENTS - North Carolina

Version 3Q03 11/12/2003

UNBUNDLED NETWORK ELEMENTS - South Carolina

UNBUNDLED NETWORK ELEMENTS - South Carolina													
CATEGORY	RATE ELEMENTS	Interim	Zone	BCS	USOC	RATES (\$)				Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Attachment 2	Exhibit A
						Nonrecurring First	Nonrecurring Add'l	Nonrecurring Disconnect First	Nonrecurring Disconnect Add'l	SOMEc	SOMAN	Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic-Disc 1st
						Rec						OSS Rates (\$)	
												SOMAN	SOMAN
UNBUNDLED LOCAL SWITCHING, PORT USAGE	End Office Switching (Port Usage)												
	End Office Switching Function Per MOU					0.0010519							
	End Office Trunk Port - Shared Per MOU					0.0002136							
	Tandem Switching (Port Usage) (Local or Access Tandem)												
	Tandem Switching Function Per MOU					0.0001634							
	Tandem Trunk Port - Shared Per MOU					0.0002863							
	Tandem Switching Function Per MOU (Melded)					0.00004951							
	Tandem Trunk Port - Shared Per MOU (Melded)					0.000086749							
	Melded Factor - 30.30% of the Tandem Rates												
	Common Transport												
	Common Transport - Per Mile Per MOU					0.0000045							
	Common Transport - Facilities Termination Per MOU					0.0004095							

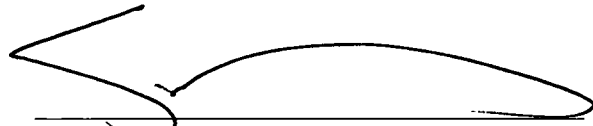
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UNBUNDLED NETWORK ELEMENTS - Tennessee

CERTIFICATE OF SERVICE

I, Guy M. Hicks, hereby certify that I have served a copy of the foregoing Petition for Approval of the Amendment to the Interconnection Agreement on the following via United States Mail on the 22 day of July, 2004:

Preferred Carrier Services, Inc.
General Counsel
14681 Midway Road, Suite 105
Addison, TX 75001



Guy M. Hicks