



BellSouth Telecommunications, Inc
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2005 OCT 18 PM 3:58
Guy M. Hicks
General Counsel
T.R.A. DOCKET ROOM
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October 18, 2005

VIA HAND DELIVERY

Hon. Ron Jones
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37238

Re. *Approval of the Amendment to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc. and NewSouth Communications Corp. Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*
Docket No. _____

Dear Chairman Jones:

Pursuant to Section 252(e) of the Telecommunications Act of 1996, NewSouth Communications Corp. 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 May 18, 2001. The Amendment adds Section 6.5.4, Rearrangements to Attachment 2 and the associated rates.

Thank you for your attention to this matter.

Sincerely yours,

A large, stylized handwritten signature in black ink, appearing to read "Guy M. Hicks".

Guy M. Hicks

cc: Bo Russell, NewSouth Communications, Corp.
John Heitmann, NewSouth Communications, Corp.
Mary Campbell, NewSouth Communications, Corp.
John Fury, NewSouth Communications, Corp.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In re: *Approval of the Amendment to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc and NewSouth Communications Corp. 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 NEWSOUTH COMMUNICATIONS CORP.
PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996

COME NOW, NewSouth Communications Corp. ("NewSouth") and BellSouth Telecommunications, Inc., ("BellSouth"), and file this request for approval of the Amendment to the Interconnection Agreement dated May 18, 2001 (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, NewSouth and BellSouth state the following:

1. NewSouth 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 NewSouth. The Interconnection Agreement was filed with the Tennessee Regulatory Authority ("TRA") on August 1, 2001 for approval.

2. The parties have recently negotiated an Amendment to the Agreement. The Amendment adds Section 6.5.4, Rearrangements to Attachment 2 and the associated rates. Copies of the Amendments are attached hereto and incorporated herein by reference.

3. Pursuant to Section 252(e) of the Telecommunications Act of 1996, NewSouth and BellSouth are submitting their Amendment to the TRA for its consideration and approval.

The Amendment provides that either or both of the parties are authorized to submit the 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 NewSouth within 90 days of their 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. NewSouth and BellSouth aver that the Amendment is consistent with the standards for approval.

6. Pursuant to 47 USC Section 252(i) and 47 C.F.R. Section 51.809, BellSouth shall make available the entire Interconnection Agreement filed and approved pursuant to 47 USC Section 252.

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

This 18th day of Oct., 2005.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

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

CERTIFICATE OF SERVICE

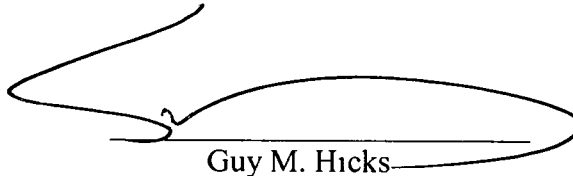
I, Guy M. Hicks, hereby certify that I have served a copy of the foregoing Petition for Approval of the Amendments to the Interconnection Agreement on the following via United States Mail on the 8th day of Oct, 2005:

Mr. Bo Russell
NewSouth Communications, Corp.
2 N. Main St.
Greenville, SC 29601

Mr. John Hitmann
NewSouth Communications, Corp.
1200 19th Street, NW
Suite 500
Washington, DC 20036

Ms. Mary Campbell
NewSouth Communications, Corp.
2 N. Main St.
Greenville, SC 29601

Mr. John Fury
NewSouth Communications Corp.
2 N. Main St.
Greenville, SC 29601



Guy M. Hicks

**Amendment to the Agreement
Between
NewSouth Communications, Corp.
and
BellSouth Telecommunications, Inc.
Dated May 18, 2001**

Pursuant to this Amendment, (the "Amendment"), NewSouth Communications, Corp ("NewSouth"), and BellSouth Telecommunications, Inc ("BellSouth"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Interconnection Agreement between the Parties dated May 18, 2001 ("Agreement") to be effective the date of the last signature executing the Amendment ("Effective Date")

WHEREAS, BellSouth and NewSouth entered into the Agreement on May 18, 2001, 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 and the Associated rates as set forth in Exhibit A of this Amendment, attached hereto and incorporated herein by this reference

6 5 4 Rearrangements

- 6 5 4 1 A request to move a working NewSouth CFA to another NewSouth CFA, where both CFAs terminate in the same BellSouth Central Office ("Change in CFA"), will be subject to the applicable nonrecurring charges set forth in Exhibit A to this Amendment
- 6 5 4 2 Upon request of NewSouth, BellSouth shall project manage the Change in CFA or re-termination of a facility as described in Section 6 5 4 1 above and NewSouth may request OC-TS for such orders and such OC-TS will be available at times designated by NewSouth 24 hours a day, 7 days a week (except holidays) The applicable rates are set forth in Exhibit A
- 6 5 4 3 BellSouth shall accept a LOA between NewSouth and another carrier that will allow NewSouth to connect a facility, or Combination that includes Dedicated Transport to the other carrier's collocation space or to another carrier's CFA
- 6 5 4 4 BellSouth shall perform appropriate pre-service tests to ensure that transport facilities are delivered to the appropriate connecting points and that applicable industry standards of service are met The Parties will use best efforts to ensure that testing for designed service is complete 24 hours in advance of the rearrangement However, performance of the testing shall not impact the rearrangement due date or time unless

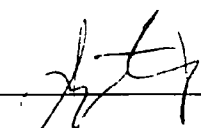
mutually agreed upon by the Parties or industry standards of service can not be met

6 5 4 5 Where batch order processing is utilized the First NRC will apply to the first circuit of the batch and the Add'l charge will apply to each additional circuit in the batch The applicable rates are set forth in Exhibit A

- 2 All of the other provisions of the Agreement, dated May 18, 2001, 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 Amendment the day and year written below.

BellSouth Telecommunications, Inc.

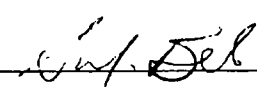
By: 

ish Name: Kristen Rowe

Title: Director

Date: 8-13-05

NewSouth Communications, Corp.

By: 

Name: Susan J. Berlin

Title: VP Sr Regulatory Counsel

Date: 8-22-2005

UNBUNDLED NETWORK ELEMENTS - Alabama																							
CATEGORY	RATE ELEMENTS	Interim	Zone	BCS	USOC	RATES(\$)				Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Attachment 2 Exh A				Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic-1st				
						Nonrecurring		First	Add'l			Nonrecurring Disconnect	First	Add'l	SOME					SOMAN	SOMAN	SOMAN	SOMAN
						First	Add'l																
ADDITIONAL NETWORK ELEMENTS															OSS Rates(\$)								
	Service Rearrangements																						
	NRC Change in Facility Assignment per circuit Service Rearrangement		I	U1TVX U1TDX UEA UDL U1TUC U1TUD U1TUB ULDVX ULDDX UNCVX UNCDX UNC1X	URETD	270 08	47 13																
	NRC Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed)		I	U1TVX U1TDX UEA UDL U1TUC U1TUD U1TUB ULDVX ULDDX UNCVX UNCDX UNC1X	URETB	1 28	1 28																
	Miscellaneous																						
	NRC - Order Coordination Specific Time - Dedicated Transport		I	UNC1X	OCOSR	18 93	18 93																

UNBUNDLED NETWORK ELEMENTS - Florida															
CATEGORY	RATE ELEMENTS	Intern m	Zone	BCS	USOC	RATES(\$)				Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Attachment 2 Exh A			
						Nonrecurring		Nonrecurring Disconnect First	Add'l			Incremental Charge - Manual Svc Order vs Electronic- 1st	Incremental Charge - Manual Svc Order vs Electronic- Add'l	Incremental Charge - Manual Svc Order vs Electronic- Disc 1st	Incremental Charge - Manual Svc Order vs Electronic- Disc Add'l
						Rec	First								
ADDITIONAL NETWORK ELEMENTS															
	Service Rearrangements														
				U1TVX, U1TDX UEA UDL U1TUC U1TUD U1TUB ULDVX ULDDX UNCVX, UNCIX UNCIX											
	NRC - Change in Facility Assignment per circuit Service Rearrangement	I			URETD		270.08		47.13						
				U1TVX, U1TDX UEA UDL U1TUC U1TUD U1TUB ULDVX, ULDDX UNCVX, UNCIX UNCIX											
	NRC - Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed)	I			URETB		1.28		1.28						
	Miscellaneous														
	NRC - Order Coordination Specific Time - Dedicated Transport	I		UNCIX	OCOSR		18.90		18.90						

UNBUNDLED NETWORK ELEMENTS - Georgia																		
CATEGORY	RATE ELEMENTS	Intern m	Zone	BCS	USOC	RATES(\$)				Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Attachment 2 Exh. A				Incremental Charge - Manual Svc Order vs Electronic- Disc Add'l		
						Nonrecurring First	Add'l	First	Add'l			SOME C	SOWAN	SOMAN	SOMAN		Incremental Charge - Manual Svc Order vs Electronic- 1st	Incremental Charge - Manual Svc Order vs Electronic- Disc 1st
ADDITIONAL NETWORK ELEMENTS																		
	Service Rearrangements																	
	NRC - Change in Facility Assignment per circuit Service Rearrangement		I	UTVX U1TDX UEA, UDL U1TUC, UITUD, U1TUB, ULDVX ULDDX UNCVX, UNCDX UNC1X	URETD		269 92		47 10									
	NRC - Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed)		I	UTVX U1TDX UEA, UDL U1TUC UITUD, U1TUB ULDVX ULDDX UNCVX, UNCDX UNC1X	URETB		1 28		1 28									
	Miscellaneous																	
	NRC - Order Coordination Specific Time - Dedicated Transport		I	UNC1X	OCOSR		18 89		18 89									

UNBUNDLED NETWORK ELEMENTS - Kentucky														
CATEGORY	RATE ELEMENTS	Intern m	Zone	BCS	USOC	RATES(\$)			Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Attachment 2 Exh A			
						Rec	Nonrecurring First	Add'l			Nonrecurring Disconnect First	Add'l	Incremental Charge - Manual Svc Order vs Electronic- 1st	Incremental Charge - Manual Svc Order vs Electronic- Disc 1st
ADDITIONAL NETWORK ELEMENTS														
	Service Rearrangements													
				UTVX U1TDX, UEA UDL U1TUC, U1TUD U1TUB, ULDVX ULDDX UNCVX UNCDX UNC1X										
	NRC - Change in Facility Assignment per circuit Service Rearrangement	I			URETD		269 66	47 05						
				UTVX U1TDX, UEA UDL U1TUC, U1TUD U1TUB, ULDVX ULDDX UNCVX UNCDX UNC1X										
	NRC - Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed)	I			URETB		1 28	1 28						
Miscellaneous														
	NRC - Order Coordination Specific Time - Dedicated Transport	I		UNC1X	QCOSR		18 87	18 87						

UNBUNDLED NETWORK ELEMENTS - Louisiana															
CATEGORY	RATE ELEMENTS	Interim	Zone	BCS	USOC	RATES(\$)				Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Attachment 2 Exh A			
						Nonrecurring		Nonrecurring Disconnect				Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic-1st
						First	Add'l	First	Add'l						
ADDITIONAL NETWORK ELEMENTS															
	Service Rearrangements														
				UITVX, U1TDX, UEA, UDL, U1TUC, U1TUD, U1TUB, ULDVX, ULDDX, UNCVX, UNCDX UNC1X											
	NRC - Change in Facility Assignment per circuit Service Rearrangement		I		URETD		269.66	47.05							
				UITVX, U1TDX, UEA, UDL, U1TUC, U1TUD, U1TUB, ULDVX, ULDDX, UNCVX, UNCDX UNC1X											
	NRC - Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed)		I		URETB		1.28	1.28							
	Miscellaneous						18.85	18.85							
	NRC - Order Coordination Specific Time - Dedicated Transport		I	UNC1X	OCOSR		18.85	18.85							

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 Exh A			
						Rec	Nonrecurring First	Add'l	Nonrecurring Disconnect First			Add'l	Incremental Charge - Manual Svc Order vs Electronic-1st	Incremental Charge - Manual Svc Order vs Electronic- Disc 1st	Incremental Charge - Manual Svc Order vs Electronic- Disc Add'l
ADDITIONAL NETWORK ELEMENTS															
	Service Rearrangements														
				U1TX U1TDX UEA UDL U1TUC U1TUD U1TUB ULDVX ULDDX UNCVX UNCDX UNC1X											
	NRC - Change in Facility Assignment per circuit Service Rearrangement	I			URETD		269 90	47 10							
				U1TX U1TDX UEA UDL U1TUC U1TUD U1TUB ULDVX ULDDX UNCVX UNCDX UNC1X											
	NRC - Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed)	I			URETB		1 28	1 28							
Miscellaneous															
	NRC - Order Coordination Specific Time Dedicated Transport	I		UNC1X	OCOSR		18 90	18 90							

UNBUNDLED NETWORK ELEMENTS - Tennessee										Attachment 2 Exh A			
CATEGORY	RATE ELEMENTS	Inter m	Zone	BCS	USOC	RATES(\$)			Svc Order Submitted Elec per LSR	Svc Order Submitted Manually per LSR	Incremental		Incremental Charge - Manual Svc Order vs Electronic- Disc Add'l
											Charge - Manual Svc Order vs Electronic- 1st	Charge - Manual Svc Order vs Electronic- Add'l	
						Nonrecurring First	Add'l	Nonrecurring First	First	Add'l	SOMAN	SOMAN	SOMAN
						Rec							
ADDITIONAL NETWORK ELEMENTS													
	Service Rearrangements												
				UTVX, UT1DX UEA, UDL, UT1TUC UTUD, UT1TUB, ULDVX, ULDDX UNCVX, UNCDX UNC1X									
	NRC - Change in Facility Assignment per circuit Service Rearrangement	I			URETD	270.55	47.21				45.68	1.76	
				UTVX, UT1DX UEA, UDL, UT1TUC UTUD, UT1TUB ULDVX, ULDDX UNCVX, UNCDX UNC1X									
	NRC - Change in Facility Assignment per circuit Project Management (added to CFA per circuit if project managed)	I			URETB	1.28	1.28				45.68	1.76	
	Miscellaneous												
	NRC - Order Coordination Specific Time - Dedicated Transport	I		UNC1X	OCOSR	18.93	18.93						