
BellSouth Telecommunications, Inc.

333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

Guy M. Hicks

General Counsel

615 214 6301

Fax 615 214 7406

April 27, 2007

VIA HAND DELIVERY

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

filed electronically in docket office on 04/27/07

Re: *Angles v. BellSouth Telecommunications, Inc.*
Docket No. 07-00053

Dear Chairman Kyle:

This is to provide the Authority an update and to request that the Authority empower a hearing officer during its April 30 agenda conference to make decisions to resolve this matter.

Angles continues to fail to pay even undisputed amounts owed to BellSouth. The attached letter from BellSouth to Angles dated April 3, 2007 provides detailed information about this delinquent account.

During the Authority's February 26, 2007 agenda conference, you asked BellSouth not to terminate service to Angles' customers without contacting the Authority first. You also asked the parties to meet to try to resolve the matter. On March 13, 2007, BellSouth representatives met with representatives of Angles and CGM, its billing consultant, in Nashville, TN. BellSouth wanted to meet sooner, but Angles and CGM had to coordinate their schedules. On March 20, 2007, a conference call was held between representatives of BellSouth and representatives of BLC/Angles and CGM. In the days following the conference call, BellSouth representatives reviewed the account in painstaking detail.

Following the meeting and conference call, BellSouth sent its April 3, 2007 letter providing Angles with BellSouth's response to Angles' billing issues, including a breakdown of charges, Angles' payments and adjustments applied by BellSouth. In response to Angles' claim that it had not received responses from BellSouth on disputed matters, BellSouth provided a breakdown of the resolution of disputes

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from June 2006 to February 2007, and a breakdown of promotional credits/cash back from June 2006 to February 2007.

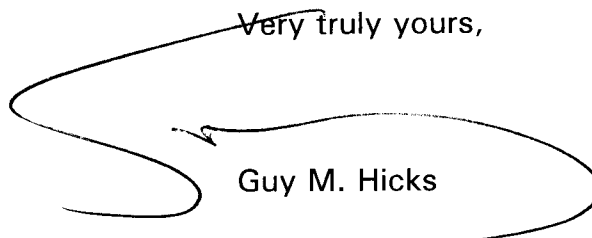
Angles has not notified BellSouth that it believes the information provided by BellSouth in its letter of April 3 is incorrect. Neither has Angles paid any past due amounts nor indicated that such payments will be forthcoming. Unfortunately, what Angles has done is continue to use BellSouth service without paying a significant past due amount, while continuing to collect revenue from its end users.

The bottom line is that BellSouth has complied fully with your request to no avail. BellSouth has agreed to meet again with Angles and CGM on May 17, 2007, with Staff, in a final effort to resolve their matter by agreement. BellSouth wanted to schedule this meeting sooner and was available to meet this week but all participants were not available. Based on prior experience, BellSouth is not optimistic that the meeting will result in any substantial payments.

Unless the May 17 meeting results in an agreement, BellSouth wishes to begin the disconnect process provided for in the interconnection agreement, initially terminating access to AT&T's Operation Support Systems, followed by disconnection of all accounts if payment is not made.

BellSouth requests that the Authority empower a hearing officer on April 30 to decide whether to (1) allow BellSouth to terminate OSS service and, if necessary, end user service, or (2) order Angles to pay a substantial portion of the amount owed into escrow immediately following the May 17 meeting. In addition, the hearing officer should be empowered to decide whether Angles should be ordered to send letters to its customers warning them that they may lose service so that they may choose an alternative service provider.

Very truly yours,

A large, stylized handwritten signature in black ink, appearing to be 'Guy M. Hicks', written over the typed name.

Guy M. Hicks

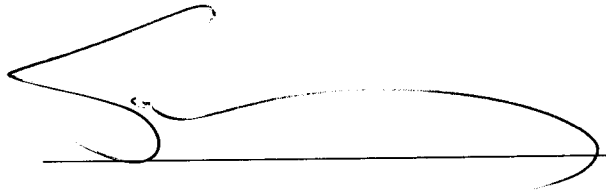
GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2007, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
1600 Division St., Suite 400
Nashville, TN 37203
hwalker@boultcummings.com

A handwritten signature in black ink, appearing to read "H. Walker", is written over a horizontal line.

BellSouth Accounts Receivable Management, Inc.
Wholesale
600 North 19th Street
22nd Floor
Birmingham, AL 35203

Gary D. Patterson
Operations Assistant Vice President

April 3, 2007

Mr. Brian Cox.
BLC Management LLC
DBA Angles Communications Solutions
7850 Stage Hills Blvd.
Memphis, TN 38133

Re: BLC Management LLC's Past Due Charges

Dear Mr. Cox:

I am writing this letter to address the billing issues we have recently discussed both in person and by conference call. After reviewing the information provided by BLC to AT&T, we have determined that BLC does indeed owe AT&T a significant amount of past due money.

Beginning June 8th 2006 BLC owed AT&T a total of \$784,770. This number is the total amount owed from the CRIS/Oracle Aging Summary from June 8, 2006. Since that time there have been payments, credits and new monthly charges added. Below is a side by side comparison of AT&T's data and the data provided by BLC (the \$120K wire payment is included in the total payment amount). The starting point is the \$787,770 and then charges, payments and credits are added for the time period of June 2006 through February 2007.

June 2006 - February 2007	AT&T	BLC
June 8, 2006	\$787,770	
Monthly Charges	\$2,624,689	\$2,600,389
Payments Applied	\$1,463,154	\$1,458,656
Adjustments Applied	\$271,130	\$0
Total End of February 2007	\$1,678,175	\$1,141,733

No matter which data one uses to calculate the past due amount, it is still significant. As you can see in the chart above, if we use BLC's spreadsheet there is a difference between payments and monthly charges of \$1,141,733. However there are at least 3 flaws with BLC's data: 1. It does not take into account balances prior to June 2006. 2. There is an entire months billing missing in July 2006 for TN account 615 Q83 1120. 3. It lists no credits BLC received from AT&T on the monthly bills.

During the conference call on March 20, 2007 when the above was explained you claimed the difference in your Monthly Charges vs. Payments was due to non promotional dispute issues. Since that time my team has gone through all the disputes both in our dispute system as well as from your vendor CGM. Below is summary of what we found.

	AT&T	BLC
Open Cash Back Prior to June 2006	\$205,950	\$210,350

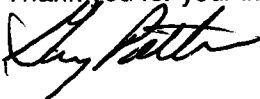
Disputes June 2006- February 2007	AT&T	BLC
Open	\$22,045	\$204,059
Denied	\$181,955	
Credited	\$4,684	

Promotional Credits/Cash Back June 2006 – February 2007	AT&T	BLC
Open	\$342,190	\$383,563
Denied	\$42,557	\$44,117
Credited	\$203,389	\$203,029

Of the \$204,059 shown as open non-promo dispute issues as provided by CGM, \$181,955 has previously been denied as an invalid disputes and resolutions have been returned to CGM. \$4,684 has been credited on BLC's bills and \$22,045 remains in open status.

Included in this package are copies of the bills from June 2006 though March 2007, copies of all the dispute resolutions sent to CGM and a copy of today's CRIS/Oracle aging summary. Using the CRIS/Oracle aging we took the total amount due for BLC and subtracted Current Charges and Open dispute/promotional credit issues to calculate the total past due today. Please take time to look over the information we have sent. If you have any substantive reasons as to why the billing amounts are incorrect, please let us know what they are in detail by Monday April 12. In the absence of the any substantive reasons we expect payment of the full undisputed past due amount of \$802,300 by Friday April 13, 2007. If payment is not received, AT&T will begin the disconnect process set forth in the interconnection agreement, initially terminating access to AT&T's Operational Support Systems, followed by disconnection of all accounts

Thank you for your immediate attention to this matter.



Gary Patterson
AT&T Credit & Collections-Southeast