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April 23, 2010

The Honorable Jocelyn Boyd
Interim Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: In the Matter of Petition for Arbitration of Interconnection Agreement Between BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina and Sprint Communications Company, L.P. ("Sprint CLEC")
Docket No. 2010-____-C

Dear Ms. Boyd:

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina respectfully submits its Petition for Section 252(b) Arbitration for filing with the Public Service Commission of South Carolina. By copy of this letter, I am serving all parties of record with a copy of this pleading as indicated on the attached Certificate of Service.

Exhibit A to this Petition is the proposed interconnection agreement that reflects the parties' disagreements as they stand as of the date of this filing. Due to its volume, AT&T South Carolina is hand-delivering a CD containing Exhibit A to the Commission today for filing. AT&T South Carolina is also hand-delivering a copy of this CD to counsel for Sprint CLEC and to counsel for the Office of Regulatory Staff on or before the date of this filing.

Sincerely,

Patrick Turner

Patrick W. Turner

PWT/nml
Enclosures
cc: Nanette S. Edwards, Esquire
John J. Pringle, Jr.
804754

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In the Matter of:	)	
Petition for Arbitration of Interconnection	)	
Agreement Between BellSouth	)	Docket No. 2010-____-C
Telecommunications, Inc. d/b/a AT&T	)	
South Carolina and Sprint	)	
Communications Company, L.P.	)	

PETITION OF BELLSOUTH TELECOMMUNICATIONS, INC.
D/B/A AT&T SOUTH CAROLINA FOR SECTION 252(b) ARBITRATION

Pursuant to Section 252(b) of the Telecommunications Act of 1996 ("1996 Act"), BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") files this Petition for Arbitration ("Petition") seeking resolution of certain issues arising between Sprint Communications Company L.P. ("Sprint CLEC") and AT&T South Carolina in the negotiation of an Interconnection Agreement ("ICA"). AT&T South Carolina states as follows:

A. STATEMENT OF FACTS

1. AT&T South Carolina is a corporation organized and existing under the laws of the State of Georgia, maintaining its principal place of business in Georgia. AT&T South Carolina's main offices in the State of South Carolina are at 1600 Williams Street, Columbia, South Carolina. AT&T South Carolina is an incumbent local exchange carrier ("ILEC") as defined in 47 U.S.C. § 251(h) and is certified to provide telecommunications services in the State of South Carolina.

2. Sprint CLEC, a Delaware limited partnership, is a competitive local exchange carrier under the 1996 Act and is authorized by the Commission to provide

telecommunications service in South Carolina. Sprint CLEC is a "telecommunications carrier" under the 1996 Act and its principal place of business is 6200 Sprint Parkway, Overland Park, Kansas 66251.

3. AT&T South Carolina and Sprint CLEC are currently parties to an ICA that was initially approved on July 9, 2002, by the Commission in Docket No. 2000-23-C, and, by mutual agreement, was amended from time to time. The amendments were filed with the Commission and approved either by the Commission or by operation of law pursuant to 47 U.S.C. §252(e)(4). That ICA was subsequently extended by Commission Order No. 2008-27 dated January 23, 2008, in Docket No. 2007-215-C and its term expired on March 19, 2010. Pursuant to the terms of the ICA, however, the ICA remains in effect after its term expires (assuming no termination for breach of ICA or otherwise) until a new ICA is negotiated and signed by the parties.

4. In anticipation of the expiration of the current ICA, and pursuant to the terms of that ICA, Sprint CLEC sent AT&T South Carolina a written request for negotiation of a new interconnection agreement, requesting that the current interconnection agreement between AT&T South Carolina and Sprint CLEC in South Carolina be used as the starting point for negotiations.

5. Thereafter, AT&T South Carolina provided a draft of the proposed successor interconnection agreement to Sprint CLEC, and the parties have negotiated the terms and conditions of the proposed agreement.

B. JURISDICTION AND TIMING

6. Section 252(b)(1) of the 1996 Act allows either party to the negotiation to request arbitration during the period between the 135th day and the 160th day from the date the request for negotiation was received. By agreement of the parties, Sprint

CLEC's request for negotiation was received November 15, 2009. Accordingly, the "arbitration window" closes on April 24, 2010, and this Petition is timely filed.

7. Section 252(b)(4)(C) of the 1996 Act requires the Commission to render a decision in this proceeding within nine months after the date upon which the request for interconnection negotiations was received. Accordingly, the 1996 Act requires the Commission to render a decision in this proceeding, absent an agreed extension, not later than August 15, 2010.

C. ISSUES FOR ARBITRATION

8. Although the parties have engaged in negotiations, many open issues remain. AT&T South Carolina hopes the parties will be able to resolve additional disputed issues before the hearing in this docket.

9. AT&T South Carolina submits herewith as **Exhibit A** a CD containing the proposed interconnection agreement that reflects the parties' disagreements as they stand as of the date of this filing.[1] Most of the language in Exhibit A is in normal font; the parties have agreed on that language. Language that AT&T South Carolina proposes and Sprint CLEC opposes is **bold and underlined**. Language that Sprint CLEC proposes and AT&T South Carolina opposes is in ***bold italics***.

10. Also submitted herewith, as **Exhibit B**, is an issues matrix or Decision Point List ("DPL") that identifies the issues set forth for arbitration. The DPL assigns an Issue Number[2] to each passage (or related passages) of disputed language, and, for each

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[1] AT&T South Carolina is hand-delivering a copy of this CD to the Commission, to counsel for Sprint CLEC, and to counsel for the Office of Regulatory Staff on or before the date of this filing.

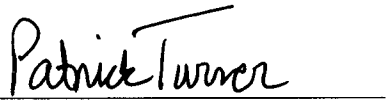
[2] The parties are negotiating and/or arbitrating a successor interconnection agreement in several states, and many of the issues originally identified have been resolved. Those issues are reflected on the DPL as "resolved." In order to avoid the

issue, identifies the issue presented and sets forth in short form AT&T South Carolina's position on the issue and Sprint CLEC's position as AT&T South Carolina understands it.

11. Pursuant to 47 U.S.C. § 252(b)(2)(B) and S.C. Code Ann. §§58-4-10, AT&T South Carolina is providing a copy of this Petition and the accompanying documentation to Sprint CLEC and the Office of Regulatory Staff on or before the day on which this Petition is filed with the Commission.

WHEREFORE, AT&T South Carolina respectfully requests that the Commission arbitrate the open issues set forth in this Petition, and enter an Order directing that AT&T South Carolina's positions on the issues raised herein be incorporated into the Interconnection Agreement between Sprint CLEC and AT&T South Carolina. Further, AT&T South Carolina requests such other, more general or specific relief as is just and proper under the circumstances.

Respectfully submitted this 23rd day of April, 2010.



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TELECOMMUNICATIONS, INC., D/B/A
AT&T SOUTH CAROLINA

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confusion that could result if remaining disputed issues are re-numbered as other issues are resolved, the parties have agreed to maintain the number originally assigned to unresolved issue throughout this proceeding.

EXHIBIT A

Exhibit A to this Petition is the proposed interconnection agreement that reflects the parties' disagreements as they stand as of the date of this filing. AT&T South Carolina hand-delivered a CD containing Exhibit A to the Commission on the day this Petition was filed, and AT&T South Carolina hand-delivered a copy of this CD to counsel for Sprint CLEC and to counsel for the Office of Regulatory Staff on or before the date this Petition was filed.

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") and that she has caused: (1) a Cover Letter, the Petition of BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina for Section 252(b) Arbitration, and Exhibit B to the Petition to be served electronically on all parties listed below; (2) a CD containing Exhibit A to the Petition to be served on William R. Atkinson by Federal Express for delivery Friday, April 23, 2010; and (3) a CD containing Exhibit A to the Petition to be filed with the Public Service Commission of South Carolina and served on Nanette S. Edwards, Esquire and John J. Pringle, Esquire by hand delivery on Friday, April 23.

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
1501 Main Street
5th Floor
Columbia, South Carolina 29202
(Sprint Communications Company, L.P.)
(Electronic Mail – Cover Letter, Petition and Exhibit B to the Petition)
(Hand Delivery – CD containing Exhibit A to Petition)

William R. Atkinson, Esquire
233 Peachtree Street, N.E.
Suite 2200
Atlanta, Georgia 30303
(Sprint Communications Company, L.P.)
(Electronic Mail - Cover Letter, Petition and Exhibit B to the Petition)
(Federal Express – CD containing Exhibit A to Petition)

Nanette S. Edwards, Esquire
Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
(Electronic Mail - Cover Letter, Petition and Exhibit B to the Petition)
(Hand Delivery – CD containing Exhibit A to Petition)

F. David Butler, Esquire
Senior Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail - Cover Letter, Petition and Exhibit B to the Petition)

Joseph Melchers
Chief Counsel
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Post Office Box 11649
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(Electronic Mail - Cover Letter, Petition and Exhibit B to the Petition)

Jocelyn G. Boyd, Esquire
Deputy Clerk
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Post Office Box 11649
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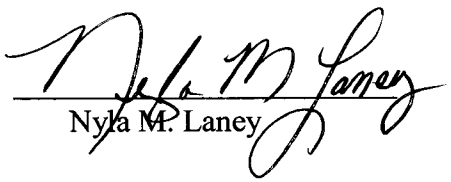
(PSC Staff)
(Electronic Mail - Cover Letter, Petition and Exhibit B to the Petition)
(Hand Delivery – CD containing Exhibit A to Petition)



Nyla M. Laney

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