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December 7, 2004

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313;

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338;

Dear Ms. Dortch:

At the request of the Policy Division Staff, BellSouth Telecommunications, Inc. ("BellSouth") is submitting the enclosed business line count data, which is based upon its ARMIS 43.08 report and which breaks down by wire center the total number of business access lines and fiber based collocators in that wire center as of December 2003.

The number of business access lines reflected in this filing includes retail business lines, pay phone lines, business resold lines, unbundled network element platforms ("UNE-P") serving business customers, as well as all unbundled loops. These line counts do not reflect the total number of business lines in each wire center, since the lines served by facilities-based competitors are not included.

In responding to this request, BellSouth discovered two problems with the data that it presented in its initial comments which is similar to that requested by the Policy Division Staff.¹ Specifically, BellSouth inadvertently omitted several wire centers from its data and included incorrect unbundled loop counts.

¹ See, e.g., Affidavit of Shelly W. Padgett, Exhibits 1 and 3.

Ms. Marlene H. Dortch

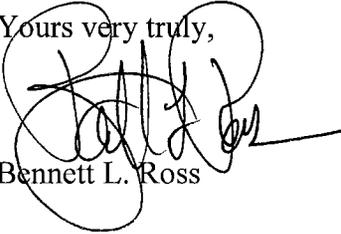
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These errors were not material and have been corrected in the business line count data that is filed herewith. The corrected data shows 1,583 central offices, as opposed to 1,574 central offices previously reported, and 81 central offices which 20,000 or more business lines, as opposed to the 80 previously reported. BellSouth will be filing revised exhibits, as well as amended ex parte letters to correct the record. BellSouth regrets these errors and apologizes for any inconvenience.

Thank you for your attention to this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read "Bennett L. Ross", is written over a circular stamp or seal. The signature is fluid and cursive.

Bennett L. Ross

BLR:kjw

Enclosure

cc:	Jeffrey Carlisle	Ian Dillner
	Michelle Carey	Russell Hanser
	Thomas Navin	Pamela Arluk
	Jeremy Miller	Marcus Maher
	Christopher Libertelli	Matthew Brill
	Jessica Rosenworcel	Daniel Gonzalez
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