

CASE

NUMBER:

99-438

INDEX FOR CASE: 1999-438
BELLSOUTH TELECOMMUNICATIONS, INC.
Complaints - Service
OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

KY. PUBLIC SERVICE COMMISSION
AS OF : 12/13/99

PAGE 1

IN THE MATTER OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, INC. VS. BELLSOUTH TELECOMMUNICATIONS, INC.

| SEQ NBR | ENTRY DATE | REMARKS |
|------------|---------------|--|
| 0001 | 10/11/1999 | Application. |
| 0002 | 10/26/1999 | Acknowledgement letter. |
| M0001 | 11/08/1999 | EDWARD BUSCH AT&T COMMUNICATIONS-MOTION TO DISMISS WITHOUT PREJUDICE |
| 0003 | 12/13/1999 | Final Order approving case dismissal. |



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

730 SCHENKEL LANE
POST OFFICE BOX 615
FRANKFORT, KY. 40602
(502) 564-3940

CERTIFICATE OF SERVICE

RE: Case No. 1999-438
BELLSOUTH TELECOMMUNICATIONS, INC.

I, Stephanie Bell, Secretary of the Public Service Commission, hereby certify that the enclosed attested copy of the Commission's Order in the above case was served upon the following by U.S. Mail on December 13, 1999.

Parties of Record:

Jim Lamoureux
AT&T Communications of the South
Central States, Inc.
Room 8068
1200 Peachtree Street, N.E.
Atlanta, GA. 30309

Honorable Richard M. Sullivan
& Honorable Edward F. Busch
Conliffe, Sandmann & Sullivan
2000 Waterfront Plaza
325 West Main Street
Louisville, KY. 40202

Honorable Creighton E. Mershon
General Counsel - Kentucky
BellSouth Telecommunications, Inc.
P. O. Box 32410
Louisville, KY. 40232

Stephanie J. Bell

Secretary of the Commission

SB/lc
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:


| | |
|------------------------------------|-------------------|
| AT&T COMMUNICATIONS OF THE |) |
| SOUTH CENTRAL STATES, INC. |) |
| |) |
| COMPLAINANT |) |
| |) |
| v. |) CASE NO. 99-438 |
| |) |
| BELLSOUTH TELECOMMUNICATIONS, INC. |) |
| |) |
| DEFENDANT |) |

O R D E R

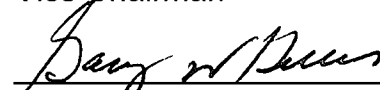
AT&T Communications of the South Central States, Inc. having moved the Commission to dismiss its complaint and the Commission finding good cause, IT IS HEREBY ORDERED that the motion to dismiss is granted and this case is dismissed without prejudice.

Done at Frankfort, Kentucky, this 13th day of December, 1999.

PUBLIC SERVICE COMMISSION


Chairman


Vice Chairman


Commissioner

ATTEST:


Executive Director

LAW OFFICES
CONLIFFE, SANDMANN & SULLIVAN

PROFESSIONAL LIMITED LIABILITY COMPANY

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KARL N. VICTOR, JR. +
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RICHARD M. SULLIVAN
JACK R. UNDERWOOD, JR.
E. BRUCE NEIKIRK
SALLY HARDIN LAMBERT
EDWIN J. LOWRY, JR.

JAMES A. BABBITZ
KENNETH A. BOHNERT
JAMES T. MITCHELL
EDWARD F. BUSCH
RICHARD B. TAYLOR
EDWARD L. LASLEY

SUBURBAN OFFICE

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141 EAST SPRING STREET
NEW ALBANY, INDIANA 47150
(812) 949-7711

November 5, 1999

I. G. SPENCER, JR.
ALLEN P. DODD, III
ALAN R. MILLER +
OF COUNSEL

+ ALSO ADMITTED IN INDIANA

Helen Helton
Executive Director
Public Service Commission
730 Schenkel Lane
Frankfort KY 40601

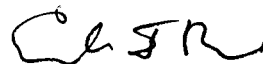
NOV - 8 1999
PUBLIC SERVICE COMMISSION

Re: Motion to Dismiss; AT&T v. BellSouth, Case No. 99-438

Dear Ms. Helton:

Enclosed please find one original and ten copies of a Motion to Dismiss without prejudice the above-referenced administrative proceeding which I ask that you file for me on behalf of AT&T Communications of the South Central States, Inc. If you have any questions, please contact me right away. Thank you for your assistance in this matter.

Sincerely,



Edward F. Busch

Before the Kentucky Public Service Commission

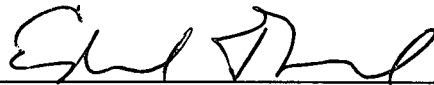
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|------------------------------------|---|------------|
| AT&T Communications of the |) | |
| South Central States, Inc. |) | |
| |) | |
| Complainant |) | No. 99-438 |
| |) | |
| v. |) | |
| |) | |
| BellSouth Telecommunications, Inc. |) | |
| |) | |
| Defendant |) | |

NOV - 3 1999

MOTION BY COMPLAINANT AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC. TO DISMISS COMPLAINT AGAINST BELL SOUTH TELECOMMUNICATIONS, INC.

On October 11, 1999, the Complainant AT&T Communications of the South Central States, Inc. (AT&T) filed a Complaint against defendant BellSouth Telecommunications, Inc. (BellSouth) thereby initiating this administrative proceeding. AT&T now petitions the Public Service Commission to enter the attached Order dismissing said Complaint without prejudice. As grounds for the Motion, AT&T states that it expects and anticipates that the parties will attempt to negotiate a resolution to the disputes connected with the underlying allegations set forth in AT&T's Complaint.

Respectfully submitted,



Jim Lamoureux
AT & T Communications of the
South Central States, Inc.
Room 8068
Peachtree Street, N.E.
Atlanta GA 30309
(404) 810-4196 (Phone)
(404) 877-7648 (Fax)

Richard M. Sullivan, Esq.
Edward F. Busch, Esq.
Conliffe, Sandmann & Sullivan
2000 Waterfront Plaza
325 West Main Street
Louisville, KY 40202
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Counsel for Complainant
AT&T Communications of the
South Central States, Inc.

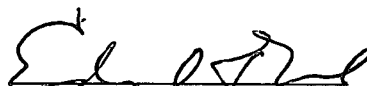
Counsel for Complainant
AT&T Communications of the
South Central States, Inc.

CERTIFICATE OF SERVICE

It is hereby certified that on this 5th day of November, 1999, a true copy hereof was mailed to the following:

Hon. Creighton E. Mershon
P.O. Box 32410
Louisville KY 40232

Counsel for BellSouth
Telecommunications, Inc.


Edward F. Busch

Before the Kentucky Public Service Commission

| | | |
|------------------------------------|---|------------|
| AT&T Communications of the |) | |
| South Central States, Inc. |) | |
| |) | |
| Complainant |) | No. 99-438 |
| |) | |
| v. |) | |
| |) | |
| BellSouth Telecommunications, Inc. |) | |
| |) | |
| Defendant |) | |

ORDER

A Motion to Dismiss having been made by Complainant AT&T Communications of the South Central States, Inc. and good cause having been shown and the Public Service Commission being otherwise sufficiently advised, IT IS HEREBY ORDERED that Complainant's Motion is GRANTED and this administrative proceeding is DISMISSED without prejudice.

PUBLIC SERVICE COMMISSION

DATE



COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

730 SCHENKEL LANE
POST OFFICE BOX 615
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(502) 564-3940

October 26, 1999

Jim Lamoureux
AT&T Communications of the South
Central States, Inc.
Room 8068
1200 Peachtree Street, N.E.
Atlanta, GA. 30309

Honorable Richard M. Sullivan
& Honorable Edward F. Busch
Conliffe, Sandmann & Sullivan
Suite 2000
325 West Main Street
Louisville, KY. 40202

Honorable Creighton E. Mershon
General Counsel - Kentucky
BellSouth Telecommunications, Inc.
P. O. Box 32410
Louisville, KY. 40232

RE: Case No. 99-438
BELLSOUTH TELECOMMUNICATIONS, INC.
(Complaints - Service) OF AT&T COMMUNICATIONS

This letter is to acknowledge receipt of initial application in the above case. The application was date-stamped received October 11, 1999 and has been assigned Case No. 99-438. In all future correspondence or filings in connection with this case, please reference the above case number.

If you need further assistance, please contact my staff at 502/564-3940.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Bell".

Stephanie Bell
Secretary of the Commission

SB/jc

LAW OFFICES

CONLIFFE, SANDMANN & SULLIVAN

PROFESSIONAL LIMITED LIABILITY COMPANY

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EDWARD L. LASLEY
ANNE SCHOLTZ HEIM

I. G. SPENCER, JR.
MICHAEL E. CONLIFFE
ALLEN P. DODD, III
D. CHRISTIAN STAPLES+
ELIZABETH M. DODD
OF COUNSEL

SUBURBAN OFFICE
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October 8, 1999 **RECEIVED**

OCT 11 1999

PUBLIC SERVICE
COMMISSION

+ALSO ADMITTED IN INDIANA
++ ALSO ADMITTED IN OHIO
+++ALSO ADMITTED IN COLORADO

Helen Helton
Executive Director
Public Service Commission
730 Schenkel Lane
Frankfort KY 40601

Re: Complaint

Dear Ms. Helton:

Enclosed please find one original and ten copies of a Complaint which I ask that you file for me on behalf of AT&T Communications of the South Central States, Inc. If you have any questions, please contact me right away. Thank you for your assistance in this matter.

Sincerely,

E. F. Busch

Edward F. Busch

CASE 99-438

Before the Kentucky Public Service Commission

AT&T Communications of the)
South Central States, Inc.)
Complainant)
v.)
BellSouth Telecommunications, Inc.)
Defendant)

RECEIVED
OCT 11 1999
No. 99-438
PUBLIC SERVICE
COMMISSION

**COMPLAINT OF AT&T
COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, INC. AGAINST BELL SOUTH
TELECOMMUNICATIONS, INC. FOR
IMPROPER APPLICATION OF
SWITCHED ACCESS CHARGES.**

Complainant AT&T Communications of the South Central States, Inc. (AT&T), pursuant to KRS 278.040(1)(2), KRS 278.260(1) and 807 KAR 5:001, hereby petitions the Public Service Commission to order defendant BellSouth Telecommunications, Inc. (BellSouth) to refund amounts improperly collected through the Carrier Common Line (CCL) switched access rate element and to cease billing and collecting the CCL charge on certain types of calls in contravention of BellSouth's applicable tariffs and Chapter 278, Kentucky Revised Statutes. In support of its request, AT&T alleges as follows:

1. AT&T, a company incorporated in New York, is authorized to provide telecommunications services in the state of Kentucky, including local, intraLATA and interLATA interexchange service. AT&T's business address is:

AT&T Communications of the
South Central States, Inc.
Room 8068
1200 Peachtree Street, N.E.
Atlanta GA 30309

Copies of pleadings, notices and orders in this docket should be served upon:

Jim Lamoureux
AT & T Communications of the
South Central States, Inc.
Room 8068
1200 Peachtree Street, N.E.
Atlanta GA 30309

(404) 810-4196

and

Richard M. Sullivan
Edward F. Busch
CONLIFFE SANDMANN & SULLIVAN
Suite 2000, 325 West Main Street
Louisville KY 40202

(502) 587-7711

2. BellSouth Telecommunications, Inc., is a local exchange company certificated by this Commission to provide local exchange telecommunications service within Kentucky. BellSouth also provides intraLATA interexchange service in the State of Kentucky. BellSouth's business address is:

BellSouth Telecommunications, Inc.
c/o Creighton E. Mershon
601 West Chestnut Street
Louisville KY 40232

3. BellSouth provides intrastate switched access service in Kentucky pursuant to Section E of its Access Services Tariff. BellSouth levies access charges against interexchange carriers, including AT&T, for use of its local exchange facilities in connection with the origination and termination of interexchange calls. A component of such access charges is the carrier common line (CCL) charge which is a charge that is expressed in dollars and cents per access minute of use and is assessed upon all interexchange carriers (IXCs) that use local exchange common line

facilities for the provision of intrastate telecommunications services. See BellSouth Access Services Tariff, Section E3, attached hereto as **Exhibit 1**. "Common Line" is defined in Section E2.6 as a line, trunk, pay telephone line or other facility provided under the General Subscriber Service Tariff of the Company, terminated on a central office switch. See **Exhibit 2**. Section E.6.7.1(B), provides that usage rates for switched access rate elements "apply only when a specific rate element is used." (Emphasis added.) See **Exhibit 3**.

4. BellSouth like other local exchange carriers ("LECs"), offers a number of optional services to its customers which provide customers with additional features and functions that are not otherwise available over a plain old telephone service ("POTS") line. These services are collectively referred to herein as "LEC Vendor Intercepted Services"¹ (VIS Services) and include:

a. Call Forwarding: The call forwarding feature allows a subscriber to route calls that would ordinarily terminate at one number (the "Initially Called Number") to another number (the "Alternate Location Number").

b. Call Waiting: The call waiting feature provides an audible tone to let a single-line phone user know that another call is attempting to complete to the line. The service provides a hold feature that is activated by a switchhook flash that enables the user to put the existing call on hold so that the waiting call can be answered. Consecutive flashes allow the subscribing customer to talk alternatively to the original and the subsequent calling party.

c. Three-way Calling: The three-way calling feature enables a single-line phone user to add a third party to the call without operator assistance. To add a third party to the call, the three-

¹ The services described herein are referred to by their common industry names. The actual names of the services may vary among the LECs.

way calling customer flashes the switchhook once to place the other party on hold, receives a dial tone, dials the third party's telephone number, and then flashes the switchhook again to establish the three way connection.

d. Foreign Exchange ("FX") Service: This service uses a private line to connect a subscriber's location with a distant central office located outside the subscriber's local calling area. With this service, a phone number in the distant central office creates the appearance of the subscriber's presence in that distant central office. Calls originating from the subscriber of the FX service are billed as if they had been dialed from the distant central office, and calls terminating to the subscriber of the FX service are billed as if they had been received by the distant central office.

5. In addition to the services described above, other additional services, which are provided by entities that may or may not be affiliated with the LECs, are offered that provide end users with additional features and functions that are not otherwise available over a POTS line. These services are collectively referred to as "Additional Vendor Intercepted Services," and include:

a. Voice Messaging or Fax Processing Services That Utilize Call Forwarding: These services enable a subscriber to forward calls that would ordinarily terminate at one number that is connected to voice messaging ("VM") or fax processing ("FP") systems. Once stored, the subscriber may retrieve his or her messages or faxes by dialing a specified number and entering a series of codes. In some cases, the VM and FP systems are located in the end office that provides local telephone service. In other cases, the VM and FP systems are located in facilities that are not collocated with the end office and are connected to the end office with a private or foreign exchange line.

b. Paging Services: Paging services are designed to deliver a message to a person whose exact whereabouts are unknown. Paging services employ selective radio signals that typically activate a paging receiver carried by the intended recipient to deliver to him a telephone number of the person who is trying to reach him. In some cases, paging systems are located in the end office that provides local telephone service. In other cases, paging systems are located in facilities that are not collocated with the end office and are connected to the end office through circuit connections.

6. Where LEC Vendor Intercepted Services and Additional Vendor Intercepted Services interact with an AT&T call, BellSouth is overcharging AT&T for carrier common line charges associated with such services. In some instances, BellSouth is assessing multiple CCL charges for use of a single subscriber loop. In other instances, BellSouth is assessing CCL charges for use of a local subscriber loop where no loop is being used. Examples of the overcharges with respect to each of these services are described below:

a. Call Forwarding: With call forwarding, the local subscriber loop associated with the Initially Called Number is never used. Instead, the end office switch redirects the call to the Alternative Location number. However, notwithstanding the fact that a local subscriber loop, i.e. the common line, is not used, BellSouth is billing AT&T CCL charges associated with the Initially Called Number. The clearest illustration of the CCL overcharge associated with call forwarding occurs when an AT&T customer dials an Initially Called Number that has been routed to an Alternative Location Number in another LATA. In that case, AT&T is inappropriately being billed for terminating access to the Initially Called Number and for originating access to another LATA. See **Exhibit 4**. Neither of these charges is appropriate because the local subscriber loop is not utilized to complete the initial call to the Initially Called

Number or to originate the other call to the Alternative Location Number. When an AT&T call is forwarded via another carrier, such as MCI, it is MCI (or whichever carrier is chosen by the call forwarding subscriber to handle the call) which is responsible for the eventual termination charges.

b. Call Waiting: With call waiting, the call that is put "on hold" is not being terminated at the subscriber's premises, but rather is "in limbo" at the point of intervention in the LEC's end office. However, AT&T is being billed CCL charges for the entire length of an AT&T call that interacts with a subscriber utilizing the call waiting service, even where the AT&T call is put on hold so that the subscriber can interact with another call. See **Exhibit 4**. CCL access charges should not be assessed for the period during which the AT&T call is on hold because the call that is put "on hold" is not utilizing a local subscriber loop.

c. Three Way Calling: The parties involved in three-way calling are interconnected through a bridging circuit in the end office which allows two conversations to take place over a single loop simultaneously. However, BellSouth applies CCL charges as if two local subscriber loops are being used. For example, where a subscriber utilizes the three-way calling feature to initiate two calls over AT&T's network, AT&T is billed two originating CCL charges in an amount measured by the entire length of the three-way call, even though only one such CCL charge is appropriate. See **Exhibit 4**.

d. Foreign Exchange Service: When a subscriber to an FX service receives a call which was dialed to its foreign end office telephone number², the call travels from the distant central

² A customer might dial the local number associated with the open end of the FX service rather than the FX subscriber's local end office telephone number if the call to the FX number is less expensive than a call to the subscriber's local end office telephone number or if the customer is unaware of the FX subscriber's local end office telephone number.

office to the subscriber over a private line, not a local subscriber loop. Therefore, terminating CCL charges on such calls would be inappropriate. However, BellSouth charges AT&T terminating CCL charges for calls over the AT&T network that terminate to subscribers of FX service. Similarly, when a subscriber to an FX service initiates a call to someone else, by utilizing its private line connection to the foreign end office to which the subscriber is connected, the call travels from the subscriber's premises to the distant central office over a private line, not a local subscriber loop. Therefore, originating CCL charges on calls are inappropriate. However, BellSouth charges AT&T originating CCL charges for calls over the AT&T network that originate from subscribers of FX service. See **Exhibit 4**.

e. Voice Messaging and Fax Processing Services: Where an incoming AT&T call to a subscriber of VM or FP services has been forwarded to a storage system that can record messages or receive faxes, terminating CCL charges are inappropriate because the call is delivered to the VM or FP systems by a carrier other than AT&T. AT&T is being overcharged terminating CCL charges as if the calls were being delivered to the Initially Dialed Number of the voice mail subscriber, which they are not. See **Exhibit 4**.

f. Paging: When an AT&T call is placed to a paging system, terminating CCL charges for such calls are inappropriate. The provider of the paging services is a carrier, not an end user. Once the call to a paging system has been placed, the paging provider utilizes radio waves to transmit a signal to the end user of the paging service. Because common line facilities are used to connect the end user and the LEC switch and are not utilized to connect carriers to the LEC switch, CCL charges associated with calls to paging systems are inappropriate. However, AT&T is being charged terminating CCL charges as if calls to paging numbers utilized a local subscriber loop. See **Exhibit 4**.

7. Pursuant to Kentucky Revised Statutes 278.160(2): "No utility may charge, demand, collect, or receive from any person greater or less compensation for any service rendered or to be rendered than that prescribed in its filed schedules and no person shall receive any service from any utility for a compensation greater or less than that prescribed in such schedules."

8. In a parallel federal action now proceeding at the Federal Communications Commission regarding VIS calls that are interstate in nature, BellSouth has not denied that calls associated with the services above are routed in the manner described herein. Instead, BellSouth has instead responded that "[n]othing in the Commission's rules require that such facilities have to be utilized for each given call at issue." See Memorandum of BellSouth dated March 22, 1994, a copy of which is annexed hereto as **Exhibit 5**. Thus, BellSouth has not disputed AT&T's assertion that it is being billed multiple CCL charges for use of single carrier common line and CCL charges where no common line has been used.

9. BellSouth has been inappropriately billing AT&T for CCL charges in the manner described above for a period of at least seven years, and continues to do so today. AT&T conducted a study of the access overcharges associated with the call forwarding, call waiting, and three way calling services based on a review of traffic over its network for a 14 day period in 1994. AT&T collected data from AT&T's call records and screened such data to isolate those calls associated with numbers for which the data showed more than one call for a particular time period (the "Overlap"). This data was further screened to eliminate those calls for which the overlap could be attributable to some cause other than double billing associated with the services discussed above.³ By screening such calls out, AT&T was able to determine that the duration of

³ For example, calls associated with PBX equipment and multi-line hunt groups were screened out.

the Overlap represented the over-billed period. The results of the study confirm that AT&T has been overcharged for CCL usage since at least 1993. AT&T contacted BellSouth in early 1994 and requested that BellSouth cease all such inappropriate billing. Other than belated correction for paging services, BellSouth has failed to correct those billing procedures.

10. The amount of such overcharges is unknown to AT&T because the information and documents required to determine the overcharges are within the possession, custody and control of BellSouth. In addition, AT&T has no data from which it could estimate the damages associated with the foreign exchange, voice mail and fax processing services. The information and documents required to determine such overcharges are within the possession, custody and control of BellSouth.

11. AT&T has attempted to resolve this matter with BellSouth through negotiation. The negotiations have failed to provide any meaningful results either with respect to refunding amounts overcharged or ceasing to overcharge AT&T.

12. BellSouth's access billing practices with respect to the VIS features described above result in multiple charges for use of a single carrier common line and result in charges where common line facilities have not been used. BellSouth's practices are inconsistent with the language in its tariff, and result in an assessment of charges that is higher than those set forth in its Access Services Tariff. As shown above, BellSouth's application of CCL charges is in clear contravention of its Access Services Tariff and in violation of Kentucky Revised Statutes Chapter 278.160(2).

13. BellSouth's access billing practices with respect to the VIS features described above result in multiple charges for use of a single carrier common line and result in charges where common line facilities have not been used. BellSouth's practice of charging multiple carrier

common line charges for a single use of a common line and charging carrier common line charges when there is no use of common line facilities constitutes an unreasonable and unjustly discriminatory practice in violation of Kentucky Revised Statutes 278.260(1).

14. BellSouth's practices set forth above are unjust, unreasonable and improper in violation of KRS 278.280(1).

WHEREFORE, for the reasons stated herein, AT&T respectfully requests that the Commission:

a. Find that BellSouth's practices with respect to carrier common line charges are unreasonable and unjustly discriminatory in violation of Kentucky Revised Statutes 278.260(1), because they result in multiple charges for a single use of the subscriber line and because they result in a charge for use of the subscriber line when no such line is used;

b. Find that BellSouth's practices with respect to carrier common line charges are in contravention of the terms of its Access Services Tariff and violate Kentucky Revised Statutes 278.160(2), because such practices result in multiple charges for a single use of the subscriber line and in charges for use of the common line facility when no such facility is used;

c. Find that the BellSouth practices described in this Complaint are unjust, unreasonable and improper in violation of KRS 278.280(1).

d. Order BellSouth to refund the amounts improperly collected through inappropriate application of the CCL rates to VIS call types as described together with interest thereon computed from the date of AT&T's payments of the excess amounts to the defendants.

e. Order BellSouth to cease the unlawful billing practices so that the overcharges do not recur; and

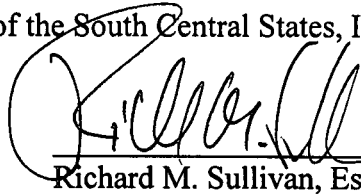
f. Grant such other or further relief as may be just and proper.

Respectfully submitted, this 8th day of October, 1999.

AT&T Communications of the South Central States, Inc.

Jim Lamoureux
AT & T Communications of the
South Central States, Inc.
Room 8068
Peachtree Street, N.E.
Atlanta GA 30309
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Counsel for Complainant
AT&T Communications of the
South Central States, Inc.



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Counsel for Complainant
AT&T Communications of the
South Central States, Inc.

BELLSOUTH
TELECOMMUNICATIONS, INC.
KENTUCKY

ACCESS SERVICES TARIFF

PSC KY. TARIFF 2E
Second Revised Page 1
Cancels First Revised Page 1
EFFECTIVE: February 16, 1997

ISSUED: January 17, 1997

BY: E.C. Roberts, Jr., President - KY
Louisville, Kentucky

E3. CARRIER COMMON LINE ACCESS SERVICE

E3.1 General Description

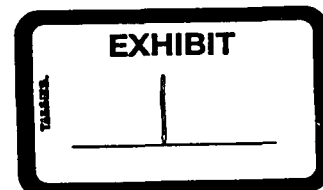
- A. The Company will provide Carrier Common Line Access Service to customers in conjunction with *BellSouth SWA* service provided in Section E6. of this Tariff. (T)
- B. Carrier Common Line Access Service provides for the use of Company common lines by customers for access to end users to furnish intrastate communications. (T)
- C. Premium Access is: *BellSouth SWA* service provided to ICs under this Tariff which furnish intrastate MTS/*BellSouth SWA* WATS; and *BellSouth SWA* service in an end office converted to equal access. (T)
- D. Non-Premium Access is *BellSouth SWA* Service provided in an end office not yet converted to equal access to customers that do not furnish intrastate MTS/WATS. (T)

E3.2 Limitations

- A. A telephone number is not provided with Carrier Common Line Access Service.
- B. Detail billing is not provided for Carrier Common Line Access Service.
- C. *BellSouth* Directory Assistance Access listings are not included in the rates and charges for Carrier Common Line Access Service.
- D. Intercept arrangements are not included in the rates and charges for Carrier Common Line Access Service.
- E. All line side connections provided in the same access group will be limited to the same features and operating characteristics.
- F. All trunk side connections provided in the same access group will be limited to the same features and operating characteristics. (T)
- G. Where *BellSouth SWA* services are connected with Special Access (*a.k.a. BellSouth SPA*) services at Company designated *BellSouth SWA* WATS serving offices for the provision of *BellSouth SWA* WATS or *BellSouth SWA* WATS-type services, *BellSouth SWA* service minutes which are carried on that end of the service (i.e., originating minutes for outward *BellSouth SWA* WATS and *BellSouth SWA* WATS-type services and terminating minutes for inward *BellSouth SWA* WATS and *BellSouth SWA* WATS-type services) shall not be assessed Carrier Common Line Access Service per minute charges. (T)

E3.3 Undertaking Of The Company

- A. Where the customer is provided with *BellSouth SWA* Service under other sections of this Tariff, the Company will provide the use of Company common lines by a customer for access to end users at rates and charges as set forth in E3.10 following. (T)



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ACCESS SERVICES TARIFF

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BY: E.C. Roberts, Jr., President - KY
Louisville, Kentucky

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E3. CARRIER COMMON LINE ACCESS SERVICE

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E3. CARRIER COMMON LINE ACCESS SERVICE**E3.3 Undertaking Of The Company (Cont'd)**

- B. The *BellSouth SWA* service provided by the Company includes the *BellSouth SWA* service provided for both interstate and intrastate communications. The Carrier Common Line Access Service rates and charges as set forth in E3.10 following apply to intrastate *BellSouth SWA* service access minutes in accordance with the rate regulations as set forth in E3.9 following. (T)

E3.4 Obligations of the Customer

- A. The *BellSouth SWA* service associated with Carrier Common Line Access Service shall be ordered by the customer under other sections of this Tariff. (T)
- B. The customer facilities at the premises of the ordering customer shall provide the necessary on-hook and off-hook supervision.

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E3. CARRIER COMMON LINE ACCESS SERVICE

(T)

E3.5 Payment Arrangements

- A. The Company will bill the Carrier Common Line Access Service. The bill day (i.e., the billing date of a bill for a customer for Access Service under this Tariff), the period of service each bill covers and the payment date in a month will be established by the Company. Payment for such bills is due on the payment due date. The payment due date is the date which is 31 days after the bill day, or by the next bill date (i.e., same date in the following month as the bill date), whichever is the shortest interval, except as provided herein, and such bills are payable in immediately available funds. If such payment due date would cause the payment to be due on a Saturday, Sunday or Holiday (e.g., New Year's Day, Independence Day, Labor Day, Thanksgiving Day, Christmas Day, and a day when Washington's Birthday, Memorial Day or Columbus Day is legally observed), payment for such bills will be due from the customer as follows:
1. If such payment due date falls on a Sunday or on a Holiday which is observed on a Monday, the payment due date shall be the first non-Holiday day following such Sunday or Holiday.
 2. If such payment due date falls on a Saturday or on a Holiday which is observed on Tuesday, Wednesday, Thursday or Friday, the payment due date shall be the last non-Holiday day preceding such Saturday or Holiday.
- B. Further, if any portion of the Carrier Common Line Access Service payment is received by the Company after the payment due date as set forth in A. preceding, or if any portion of the Carrier Common Line Access Service payment is received by the Company in funds which are not immediately available to the Company, then a late payment penalty may be due to the Company. The late payment penalty shall be the portion of the Carrier Common Line Access Service payment not received by the payment due date times a late factor. The late factor shall be the lesser of:
1. The highest interest rate (in decimal value) which may be levied by law for commercial transactions or public utilities compounded daily for the number of days from the first date to and including the last date of the period involved, or

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E3. CARRIER COMMON LINE ACCESS SERVICE

E3.5 Payment Arrangements (Cont'd)

- B. (Cont'd)
2. 0.000590 per day, compounded daily for the number of days from the first date to and including the last date of the period involved.
- C. In the event of a billing dispute concerning Carrier Common Line Access Service billed to the customer by the Company, the customer must submit a documented claim for the disputed amount. If the dispute is submitted on or before the payment due date or within 90 days after the payment due date and the disputed amount is paid prior to resolution of the dispute, any interest credits due the customer upon resolution of the dispute shall be calculated from the date of the overpayment to the resolution date. If the dispute is submitted more than 90 days after the payment due date and the disputed amount is paid prior to resolution of the dispute, any interest credits due the customer upon resolution of the dispute shall be calculated from the dispute date or the date the payment is made, whichever occurs later, to the resolution date. The Company will resolve the dispute and assess interest credits or late payment penalties to the customer as set forth in B. preceding.

E3.6 Determination of Usage Subject to Carrier Common Line Access Service Charges

Except as set forth herein, all BellSouth SWA service provided to the customer will be subject to Carrier Common Line Access Service charges.

- A. When the customer reports interstate and intrastate use of BellSouth SWA service, the associated Carrier Common Line Access Service used by the customer for intrastate use will be determined as set forth in E3.9.D. following.
- B. Where BellSouth SWA FGC and BellSouth SWA TSBSA 2 end office switching is provided without Company recording and the IC records minutes of use used to determine Carrier Common Line Access Service charges (i.e., BellSouth SWA FGC and BellSouth SWA TSBSA 2 operator and calls such as *line controlled pay station* sent-paid, operator-DDD, operator-person, collect, credit-card, third number and/or other like calls), the IC shall furnish such minutes of use detail to the Company in a timely manner. If the IC does not furnish the data to the Company, the IC shall identify all BellSouth SWA services which could carry such calls in order for the Company to accumulate the minutes of use through the use of special Company measuring and recording equipment.
- C. When access to the local exchange is required to provide a customer service (e.g., MTS/BellSouth SWA WATS type, telex, data, etc.), that uses a resold private line service, BellSouth SWA service rates and regulations, as set forth in Section E6. following will apply except when such access to the local exchange is required for the provision of an enhanced service. Carrier Common Line Access Service rates and charges as set forth in E3.10 following apply in accordance with the resale rate regulations as set forth in E3.7 following.

E3.7 Resold Services

- A. Where the customer is reselling MTS and/or MTS/BellSouth SWA WATS-type service(s) on which the Carrier Common Line Access and BellSouth SWA service charges have been assessed, the customer may, at the option of the customer, obtain BellSouth SWA FGA, BellSouth SWA FGB, BellSouth SWA FGD, BellSouth SWA LSBSA, or BellSouth SWA TSBSA 1 and BellSouth SWA 3 service under this Tariff as set forth in Section E6. following for originating and/or terminating access in the local exchange. Such access group arrangements, whether single lines or trunks or multiline hunt groups or trunk groups, will have Carrier Common Line Access Service charges applied as set forth in E3.10 following in accordance with the resale rate regulations set forth in this section. For purposes of administering this provision:
 1. Resold intrastate terminating MTS and MTS-type service(s) shall include collect calls, third number calls and credit card calls where the reseller pays the underlying carrier's service charges; and shall not include interstate minutes of use.
 2. Resold intrastate originating MTS and MTS-type service(s) shall not include collect, third number, credit card or interstate minutes of use.

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E3. CARRIER COMMON LINE ACCESS SERVICE**E3.7 Resold Services (Cont'd)**

- B.** When the customer is reselling MTS and/or MTS-type service as set forth in A. preceding, the customer will be charged the Carrier Common Line Access Service charges in accordance with the resale rate regulations as set forth in D. following if the customer or the provider of the MTS service furnishes documentation of the MTS usage and/or the customer furnishes documentation of the MTS-type usage. Such documentation supplied by the customer shall be supplied each month and shall identify the involved resold MTS and/or MTS-type services. The monthly period used to determine the minutes of use for resold MTS and/or MTS-type service(s) shall be the most recent monthly period for which the customer has received a bill for such resold service(s). This information shall be delivered to the Company, at a location specified by the Company, no later than 15 days after the bill date shown on the resold MTS and/or MTS-type service bill. If the required information is not received by the Company, the previously reported information, as described preceding, will be used for the next two months. For any subsequent month, no allocation or credit will be made until the required documentation is delivered to the Company by the customer.
- C.** When the customer utilizes *BellSouth SWA* service as set forth in B. preceding, the Company may request a certified copy of the customer's resold MTS and/or MTS-type usage billing from either the customer or the provider of the MTS or MTS-type service. Requests for this billing will relate back no more than 12 months prior to the current billing period.
- D.** When the customer is provided an access group to be used in conjunction with the resale of MTS and/or MTS-type services as set forth in A. preceding, subject to the limitations as set forth in E3.2 preceding, and the Company receives the usage information required to calculate the adjustment of Carrier Common Line Access Service charges as set forth in B. preceding, the customer will be billed as set forth in E., F. or G. depending upon, respectively, whether the usage is from non-equal access offices, equal access offices or a combination of the two.

When the customer is provided with more than one access group in a LATA in association with the resale of MTS and/or MTS-type services, the resold minutes of use will be apportioned as follows:

1. The Company will apportion the resold originating MTS and/or MTS-type services and originating minutes of use for which the resale credit adjustment applies, among the access groups. Such apportionment will be based on the relationship of the originating usage for all access groups in the LATA. For purposes of administering this provision:
 - a. Resold originating MTS and/or MTS-type services minutes shall be only those attributable to intrastate originating MTS and/or MTS-type minutes and shall not include collect, third number, credit card or interstate minutes of use.
 - b. The resale credit adjustment shall apply for resold originating MTS and MTS-type services and minutes of use, provided Carrier Common Line and Switched Access charges have been assessed on such services.
2. The Company will apportion the resold terminating MTS and/or MTS-type services and terminating minutes of use for which resale credit adjustment applies, among the access groups. Such apportionment will be based on the relationship of the terminating usage for each access group to the total terminating usage for all access groups in the LATA. For purposes of administering this provision:
 - a. Resold terminating MTS and/or MTS-type services minutes shall be only those attributable to intrastate terminating MTS and/or MTS-type (i.e., collect calls, third number calls, and credit card calls) and shall not include interstate minutes of use or MTS and/or MTS-type minutes of use paid for by another party.
 - b. The resale credit shall apply for resold terminating MTS and MTS-type services and minutes of use, provided Carrier Common Line and Switched Access Charges have been assessed on such services.

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E3. CARRIER COMMON LINE ACCESS SERVICE

E3.7 Resold Services (Cont'd)

D. (Cont'd)

3. In order for the rate regulations to apply as set forth in *E.*, *F.* or *G.* following, the access groups and the resold MTS and/or MTS-type services must be provided in the same *state* (*except when the same extended area service arrangement is provided in two different states by the same Company*) in the same exchange, provided by the same Company and connected directly or indirectly. *For those exchanges that encompass more than one state, the customer shall report the information by state within the exchange.* (T) (N) (C) (C)
4. Each of the access group arrangements used by the customer in association with the resold MTS and/or MTS-type services must be connected either directly or indirectly to the customer designated premises at which the resold MTS and/or MTS-type services are terminated. Direct connections are those arrangements where the access groups and resold MTS and/or MTS-type services are terminated at the same customer designated premises. (C)
5. Indirect *originating* connections are those arrangements where the access groups and the resold *originating* MTS and/or MTS-type services are *physically located* at different customer designated premises in the same exchange. Such different customer designated premises are connected by facilities that permit a call to flow from access groups to resold MTS and/or MTS-type services. (C)
6. Indirect *terminating* connections are those arrangements where the access groups and resold *terminating* MTS and/or MTS-type services are *physically located* at different customer designated premises in the same exchange. Such different customer designated premises are connected by facilities that permit a call to flow from resold *terminating* MTS and/or MTS-type services to access groups. (C)
7. (DELETED) (D)
8. The adjustments as set forth following will be computed separately for each access group. (T)(M)

E. Access Groups - Non-Equal Access Offices Only

1. When all the usage on an access group originates from and/or terminates at end offices that have not been converted to equal access the non-premium access charge per minute as set forth in *E3.10* following will apply. The *access minutes which will be subject to Carrier Common Line Access Service charges* will be the adjusted terminating intrastate access minutes plus the adjusted originating intrastate access minutes *for* such access groups. (T)(M)
2. The adjusted terminating access minutes will be the terminating intrastate access minutes less the reported resold *terminating* MTS and/or MTS-type service minutes of use as set forth in D. preceding; but not less than zero. The adjusted originating access minutes will be the originating intrastate access minutes less the reported resold *originating* MTS and/or MTS-type service minutes of use as set forth in D. preceding; but not less than zero. (C)(M)

F. Access Groups - Equal Access Offices Only

1. When all the usage on an access group originates from and/or terminates at end offices that have been converted to equal access, the premium access charge per minute as set forth in *E3.10* following will apply. The minutes billed Carrier Common Line Access Service charges will be the adjusted terminating intrastate access minutes and the adjusted originating intrastate access minutes for such access groups. (T)(M)
2. The adjusted terminating access minutes will be the terminating intrastate access minutes less the reported resold *terminating* MTS and/or MTS-type service minutes of use as set forth in D. preceding; but *not* less than zero. The adjusted originating access minutes will be the originating intrastate access minutes less the reported resold *originating* MTS and/or MTS-type service minutes of use; but not less than zero. (C)(M)

(M)

Material appearing on this page previously appeared on page(s) 7 of this section.
Material previously appearing on this page now appears on page(s) 5 of this section

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E3. CARRIER COMMON LINE ACCESS SERVICE**E3.7 Resold Services (Cont'd)****G. Access Groups - Non-Equal Access and Equal Access Offices**

1. When an access group has usage that originates from and/or terminates at both end offices that have been converted to equal access and end offices that have not been converted, both premium and non-premium per minute charges as set forth in E3.10 following will apply respectively. The minutes billed Carrier Common Line Access Service charges will be the adjusted terminating intrastate access minutes plus the adjusted originating intrastate access minutes for such access groups.
2. The adjusted terminating access minutes will be the terminating intrastate access minutes less the reported resold terminating MTS and/or MTS-type service minutes of use as set forth in D. preceding; but not less than zero. The adjusted originating access minutes will be the originating intrastate access minutes less the reported resold originating MTS and/or MTS-type service minutes of use as set forth in D. preceding; but not less than zero.
3. The adjusted originating access minutes and the adjusted terminating access minutes will be apportioned between premium and non-premium access minutes using end-office specific usage data when available, or when usage data are not available, the premium and non-premium ratios developed as set forth in D. following. The premium and non-premium per minute charges set forth in E3.10 following will apply as appropriate to the premium and non-premium access minutes determined in this manner.

H. The adjustment as set forth in E., F. or G. preceding will be made to the involved customer account no later than either the next bill date, or the one subsequent to that, depending on when the usage report is obtained.

I. When the MTS and/or MTS-type usage is shown in hours, the number of hours shall be multiplied by 60 to develop the associated MTS and MTS-type minutes of use. If the MTS and/or MTS-type usage is shown in a unit that does not show hours or minutes, the customer shall provide a factor to convert the shown units to minutes.

J. The adjustment as set forth in E., F., or G. preceding will be made to the involved customer account after making the adjustments to the customer account as set forth in E3.9 following.

E3.8 (DELETED)

(D)

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E3. CARRIER COMMON LINE ACCESS SERVICE

E3.8 (DELETED) (Cont'd)

(D)

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E3. CARRIER COMMON LINE ACCESS SERVICE

E3.9 Rate Regulations (Cont'd)

E. (Cont'd)

5. (Cont'd)

For originating access minutes of use associated with calls placed to 700, 800 and 900 numbers which terminate on a *BellSouth SWA* service assessed Carrier Common Line Access Service charges, the customer shall report as follows: On or before the fifteenth day of each March, June, September and December the customer shall provide the Company a report of the percentage of total intrastate 700, 800, and 900 originating minutes of use that will terminate in a *BellSouth SWA* service that is assessed Carrier Common Line Access Service charges for the forthcoming quarter. The reported percentage will be used by the Company to determine the customer's current monthly bill for the originating minutes of use for which the report was provided as set forth in 6. following. The customer reported percentage should reflect any under or over estimate in the prior quarter. In the event the customer does not supply a report, the Company will assume the percentage to be the same as that provided in the previous quarterly report. (T)

If a dispute arises concerning the customer provided quarterly percentage report, the Company may request the customer to provide the data the customer used to determine the percentage. The customer shall keep records from which the reported percentage credit can be ascertained. Upon request of the Company, the customer shall make records available for inspection as reasonably necessary for purposes of verification of the percentages and shall supply the data within 30 days of the Company request. The Company will not request such data more than twice a year.

6. The originating premium access and/or non-premium access per minute charge(s) apply to all originating access minutes of use, less those originating access minutes of use associated with calls placed to 700, 800, and 900 numbers and less those originating access minutes of use associated with *BellSouth SWA* FGA and *BellSouth SWA* LSBSA services where the off-hook supervisory signalling is forwarded by the customer's equipment when the called party answers, plus all originating access minutes of use associated with calls placed to 700, 800 and 900 numbers for which the customer furnishes a report of the percentage of minutes that terminate in a *BellSouth SWA* service that is assessed Carrier Common Line Access Service charges, and for which a corresponding reduction in the number of terminating access minutes of use has been made as set forth in 5. preceding. (T)

E3.10 Rates And Charges

A. The rates for Carrier Common Line Access Service are:

1. Premium Access

| | Rate | USOC |
|----------------------------|---------|------|
| (a) Terminating per minute | \$.0000 | NA |
| (b) Originating per minute | .0000 | NA |

2. Non-Premium Access

| | | |
|----------------------------|-------|----|
| (a) Terminating per minute | .0000 | NA |
| (b) Originating per minute | .0000 | NA |

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E3. CARRIER COMMON LINE ACCESS SERVICE

E3.8 (DELETED) (Cont'd)

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E2. GENERAL REGULATIONS**E2.6 Definitions (Cont'd)****CHANNELIZE**

The term "Channelize" denotes the process of multiplexing-demultiplexing wider bandwidth or higher speed channels into narrower band-width or lower speed channels, and vice versa.

CLEAR CHANNEL CAPABILITY

The term "Clear Channel Capability" denotes the ability to transport twenty-four, 64Kbps channels over a 1.544 Mbps High Capacity service via B8ZS line code format.

C-MESSAGE NOISE

The term "C-Message Noise" denotes the frequency weighted average noise within an idle voice channel. The frequency weighting, called C-message, is used to simulate the frequency characteristic of the 500-type telephone set and the hearing of the average subscriber.

C-NOTCHED NOISE

The term "C-Notched Noise" denotes the C-message frequency weighted noise on a voice channel with a holding tone, which is removed at the measuring end through a notch (very narrow band) filter.

(DELETED)**COMMON LINE**

The term "Common Line" denotes a line, trunk, pay telephone line or other facility provided under the General Subscriber Service Tariff of the Company, terminated on a central office switch. A common line-residence is a line or trunk provided under the residence regulations of the General Subscriber Service Tariff. A common line-business is a line provided under the business regulations of the General Subscriber Service Tariff.

COMMUNICATIONS SYSTEM

The term "Communications System" denotes channels and other facilities which are capable of communications between terminal equipment provided by other than the Company.

COMPANY

Whenever used in this Tariff, the term "Company" or the name South Central Bell Telephone Company denotes BellSouth Telecommunications, Inc.

CUSTOMER(S)

The term "Customer(s)" denotes any individual, partnership, association, joint-stock company, trust, corporation, or governmental entity or other entity which subscribes to the services offered under this Tariff, including both Interexchange Carriers (ICs) and End Users except in Section E6., BellSouth SWA service, where "Customer(s)" denotes Interexchange Carriers (ICs), Enhanced Service Providers (ESPs), End Users for BellSouth SWA FGA FX/ONAL service, and 500 Service Providers for BellSouth SWA 500 service.

(D)

EXHIBIT

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E6. BELLSOUTH SWA SERVICE

E6.7 Rate Regulations (Cont'd)

E6.7.1 Description And Application Of Rates And Charges (Cont'd)

A. Monthly Rates

Monthly rates are flat recurring rates that apply each month or fraction thereof that a specific rate element is provided. Elements having a monthly "per mile" charge are charged per mile, per month. For the Switched DNAL, the applicable mileage band rate will be applied per mile, per month. For billing purposes, each month is considered to have thirty days.

B. Usage Rates

Usage rates are rates that apply only when a specific rate element is used. These are applied on a per access minute basis or on a per call basis. BellSouth SWA Common Transport transmission rates will be applied on a per mile, per minute of use basis. Usage Rate charges are accumulated over a monthly period.

1. BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening Service

A per call charge as specified in E6.8.4 following applies for each 800 call utilizing BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening service for which an BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening service Customer is identified.

2. BellSouth SWA 500 Service

A per call charge, as specified in E6.8.13 following, applies for each 500 call.

C. Nonrecurring Charges

Nonrecurring charges are one-time charges that apply for a specific work activity (i.e., installation of new service or change to an existing service). The types of nonrecurring charges that apply for BellSouth SWA service are: installation of new service, installation of optional features and BSEs, service arrangements, transfer of service, BellSouth SWA 500, BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening, and BellSouth SWA 900 services.

The following list identifies the individual BellSouth SWA service elements, for which charges are set forth in Section E6. of this Tariff, which are eligible for credit of nonrecurring charges under "Service Installation Guarantee" found in E2.4.10 preceding. *Customers with these services are not eligible for the Service Installation Guarantee when the requested installation, move or rearrangement service order interval is four days or less as measured from the Application Date of the order.* (C)

Switched Local Channels

BellSouth SWA Transport (Interoffice channel) Installation

Optional Features (Installed coincident with Switched Local Channels, Switched Interoffice Channels and associated Channelization equipment,) and

Dedicated Network Access Line Service

The following list identifies the BellSouth SWA Service elements not eligible for credit of nonrecurring charges under "Service Installation Guarantee" found in E2.4.10 preceding.

BellSouth SWA Service Rearrangements, Conversions, and/or Inside Moves,

Activation of BellSouth SWA 900 Service codes,

BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening Service

BellSouth SWA 500 Service

The BellSouth SWA FGD CCSAC and the SS7 Signaling Connection, and

Transfer of Service

Customers will be exempt from nonrecurring charges for the installation of new BellSouth SWA transport facilities and optional features associated with those facilities, as set forth in E6.8.1 following, prompted by BellSouth SWA Transport Restructure, pursuant to the provisions set forth in C.3, following, during the time periods established therein.

The exemption is applicable to the installation of facilities in connection with those rearrangements of existing BellSouth SWA services which qualify for the waiver of service rearrangement nonrecurring charges for roll-overs and grooming, as set forth in E6.7.1.C.3.

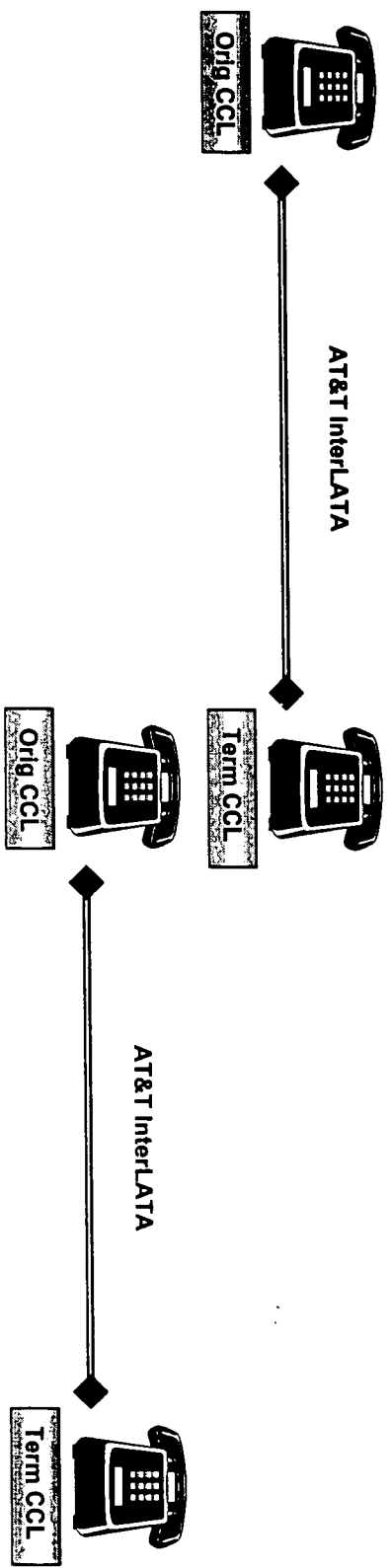
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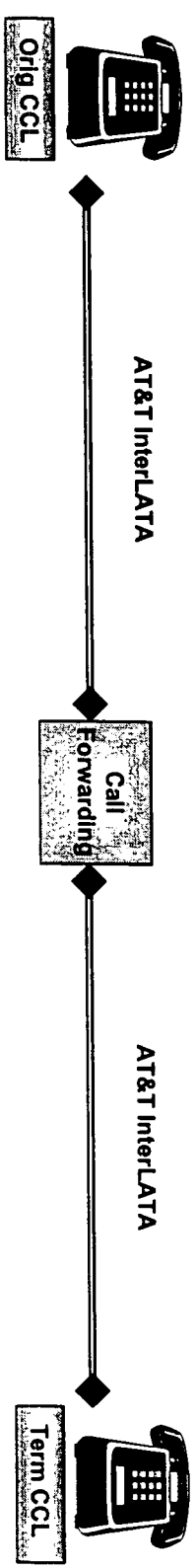
VIS Call Flow Evaluation

Call Forwarding: AT&T InterLATA to AT&T InterLATA

- Current Billing as Two Calls



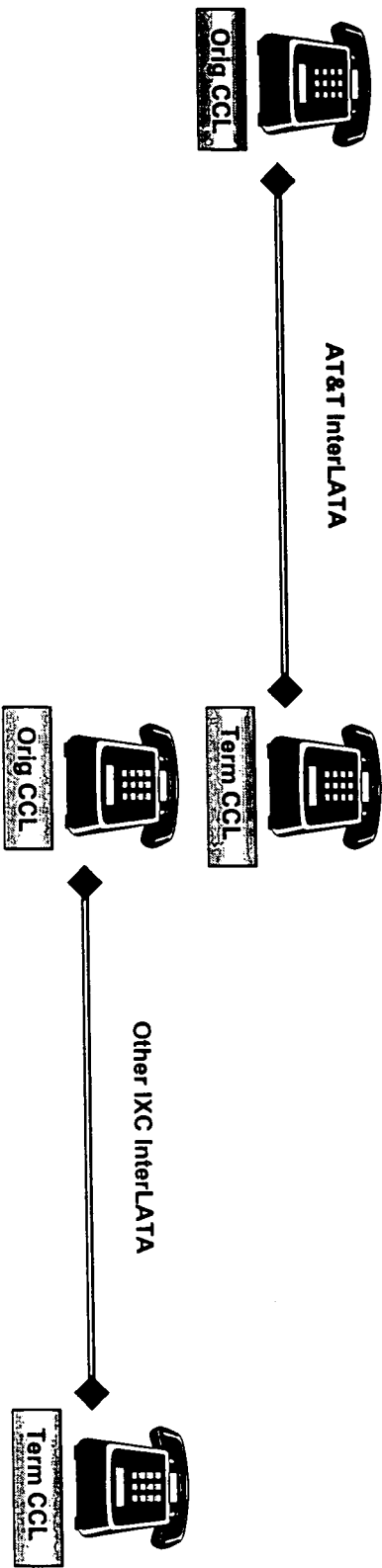
- Corrected Billing for Single Carrier of Single Call



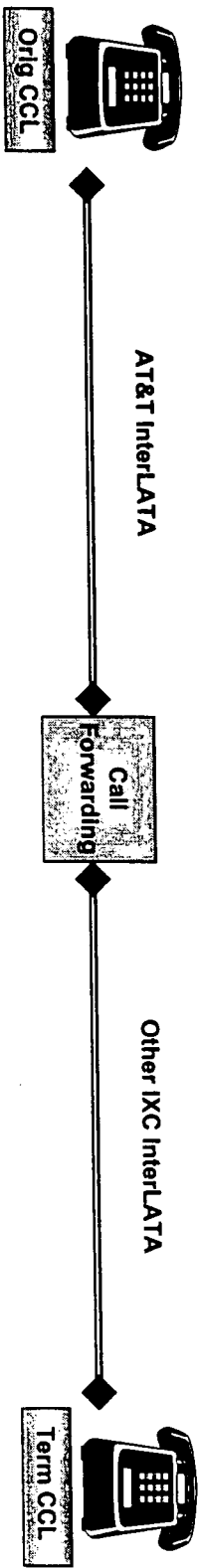
VIS Call Flow Evaluation

Call Forwarding: AT&T InterLATA to Other IXC InterLATA

- Current Billing as Two Calls



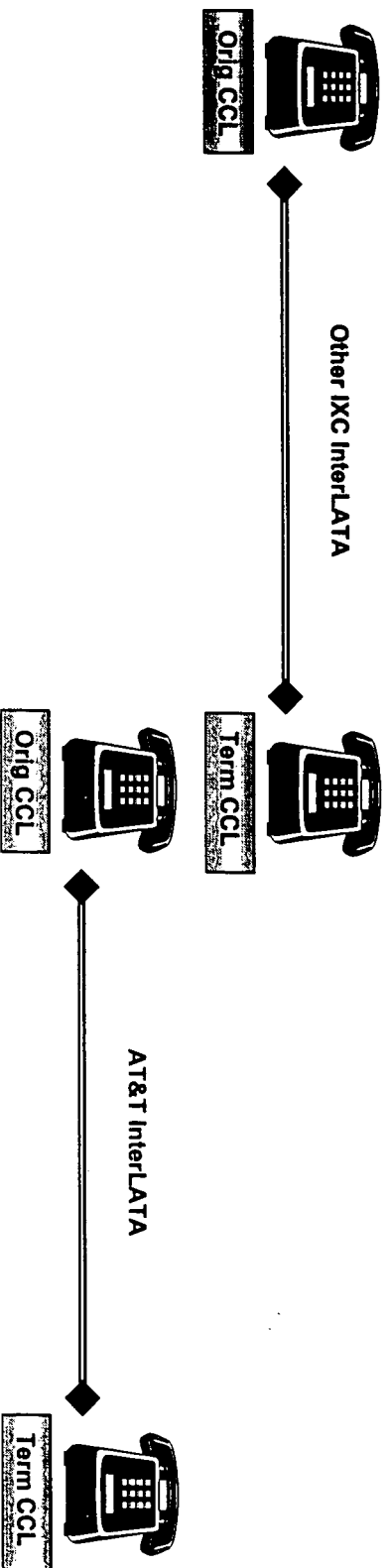
- Corrected Billing for Co-Carriers of Single Call



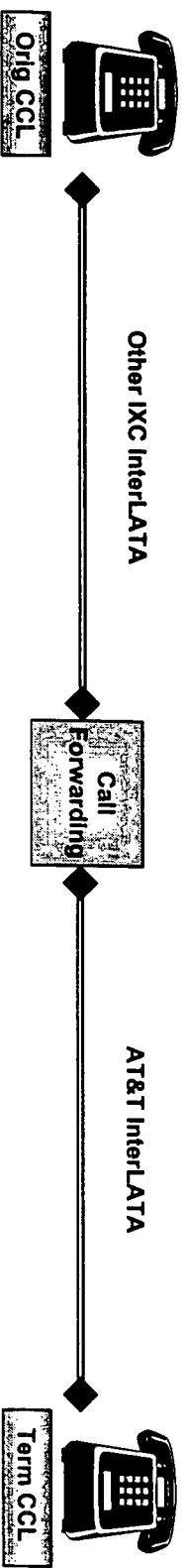
VIS Call Flow Evaluation

Call Forwarding: IXC InterLATA to AT&T InterLATA

- Current Billing as Two Calls



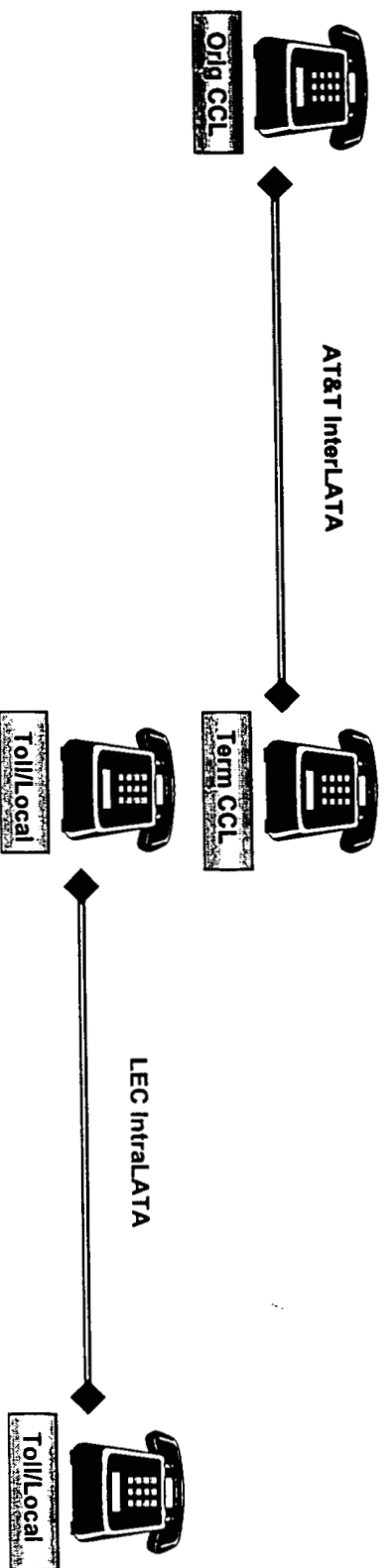
- Corrected Billing for Co-Carriers of Single Call



VIS Call Flow Evaluation

Call Forwarding: AT&T InterLATA to LEC IntralATA

- Current Billing as Two Calls



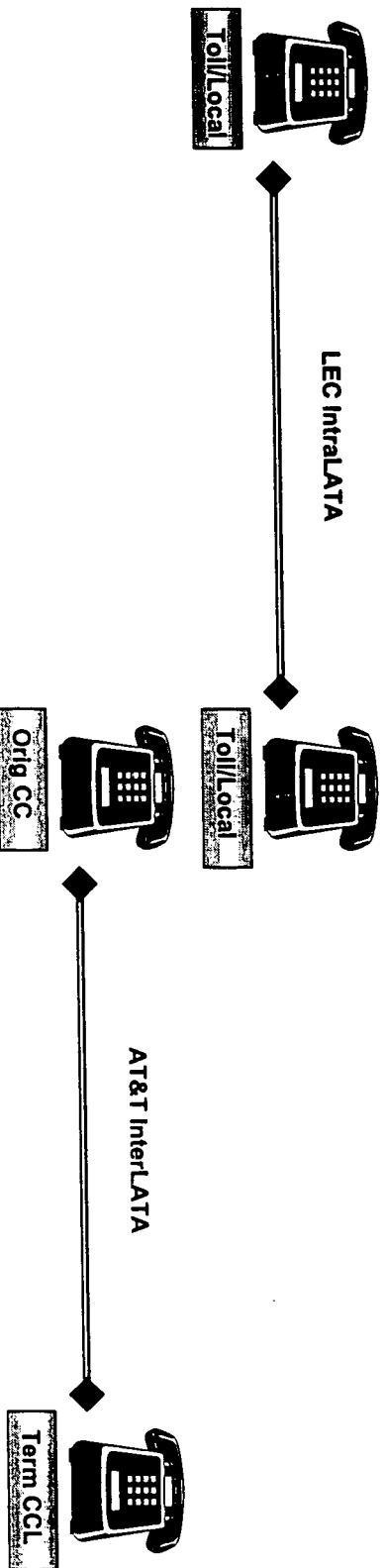
- Corrected Billing for Co-Carriers of Single Call



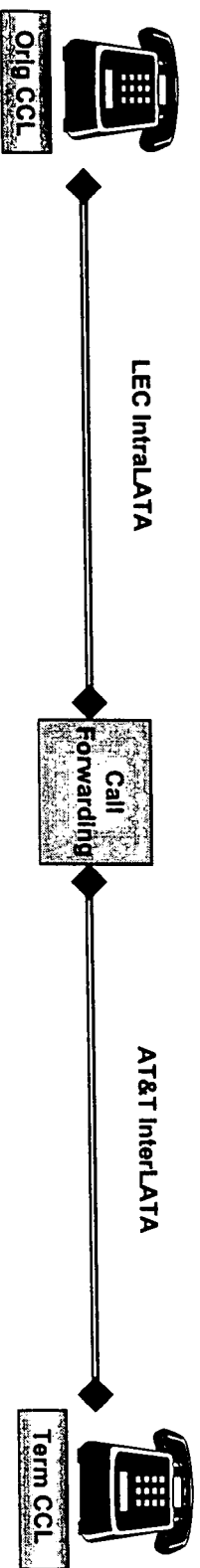
VIS Call Flow Evaluation

Call Forwarding: LEC IntralATA to AT&T InterLATA

- Current Billing as Two Calls



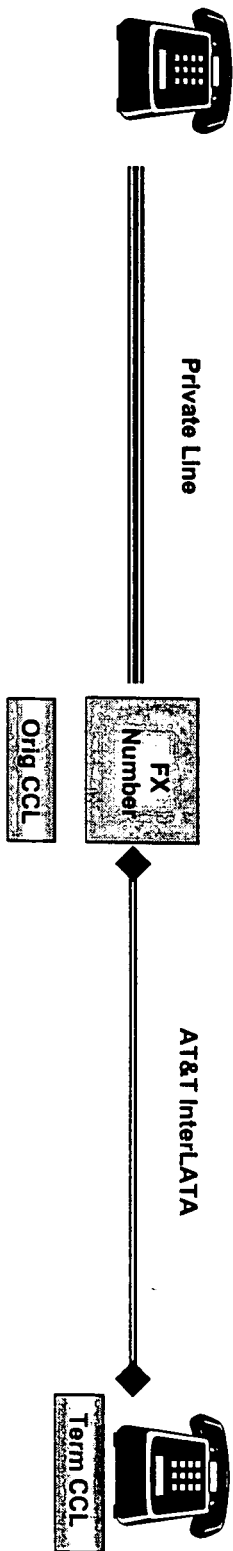
- Corrected Billing for Co-Carriers of Single Call



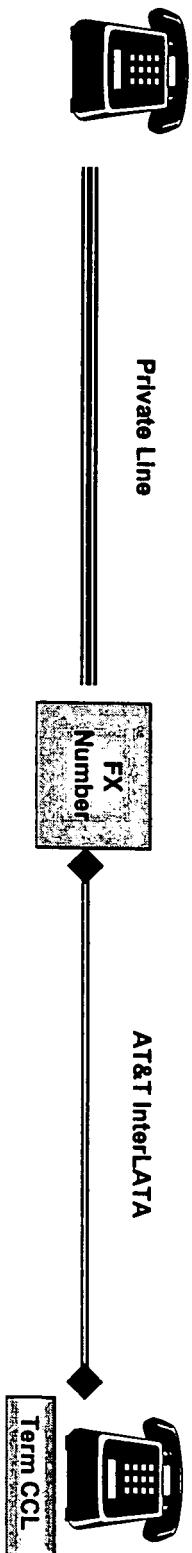
VIS Call Flow Evaluation

Foreign Exchange: FX Number to AT&T InterLATA

- Current Billing as Two-Ended Call



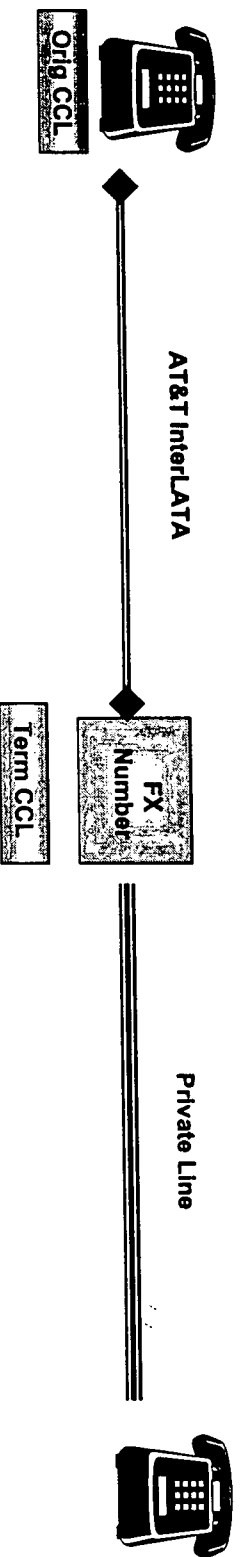
- Corrected Billing as One-Ended Call



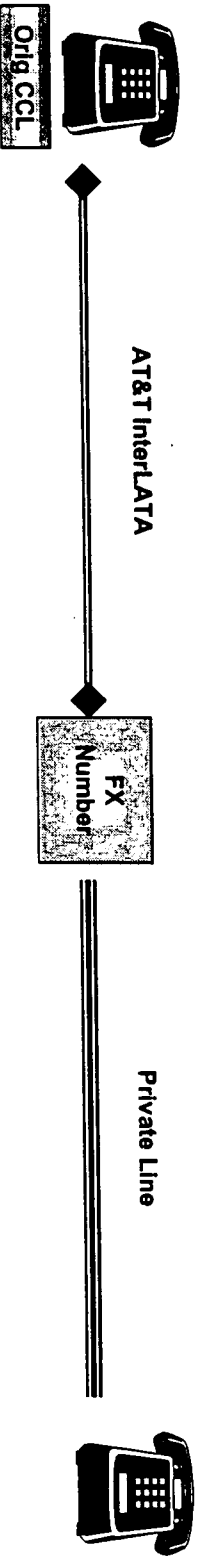
VIS Call Flow Evaluation

Foreign Exchange: AT&T InterLATA to FX Number

- Current Billing as Two-Ended Call



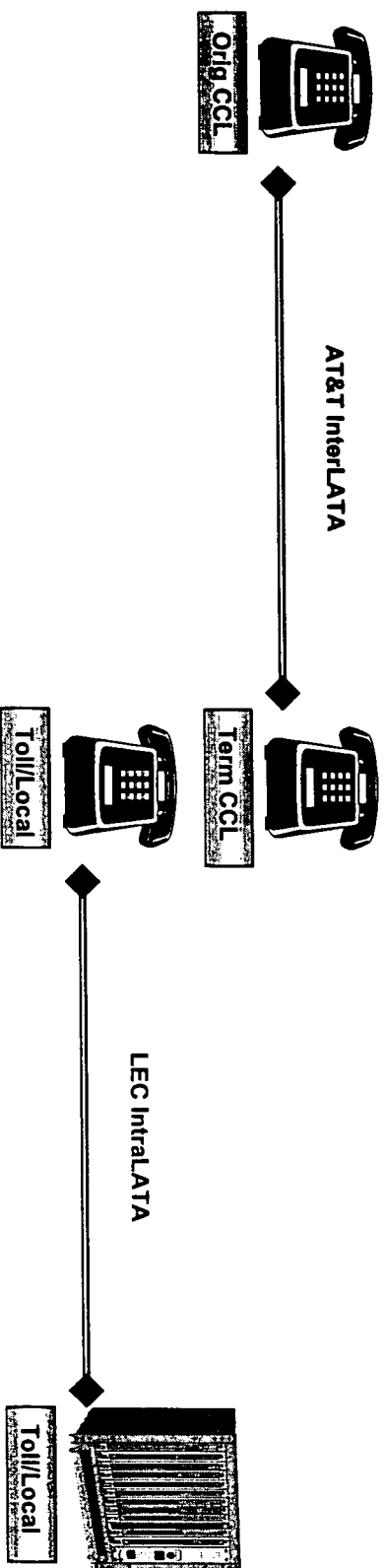
- Corrected Billing as One-Ended Call



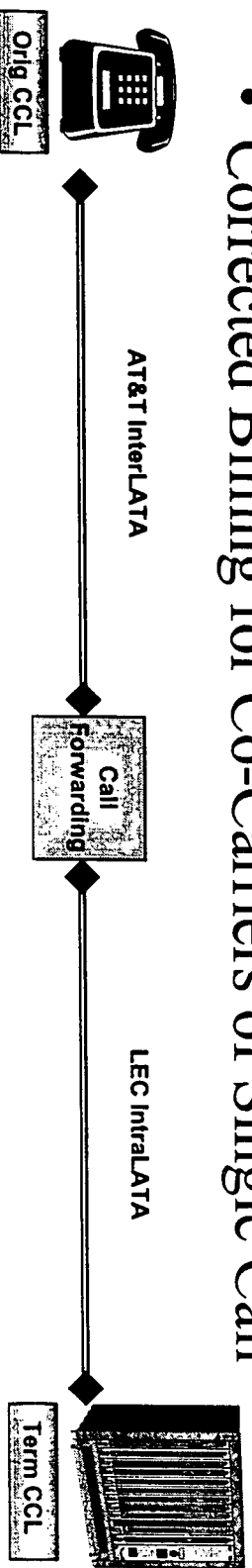
VIS Call Flow Evaluation

Call Forwarding: AT&T InterLATA to LEC VM

- Current Billing as Two Calls



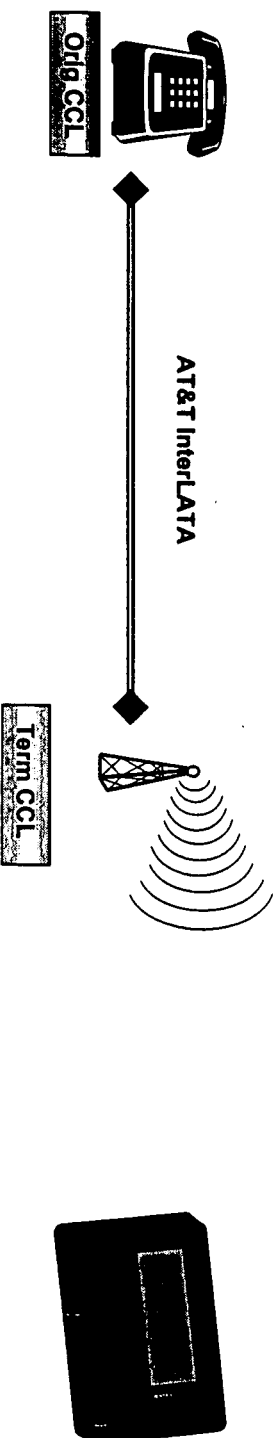
- Corrected Billing for Co-Carriers of Single Call



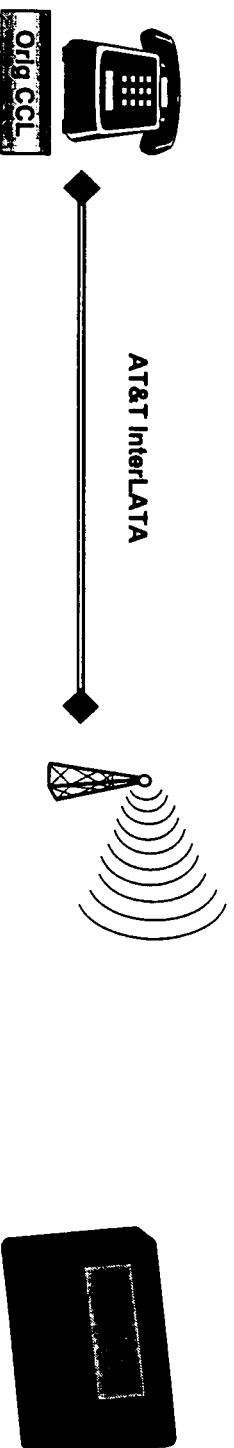
VIS Call Flow Evaluation

Paging: AT&T InterLATA to Paging Number

- Current Billing as Two-Ended Call



- Corrected Billing as One-Ended Call



3-22-94

**APPLICATION OF SWITCHED ACCESS SERVICE
ELEMENTS CARRIER COMMON LINE AND LOCAL SWITCHING**

BellSouth has reviewed the FCC's Part 69 rules relative to the application of Carrier Common Line (Part 69.105) and Local Switching (Part 69.106) charges for the various scenarios provided by AT&T. Those scenarios are attached with the rate elements shown that BellSouth believes are appropriate.

Under the scenarios presented by AT&T, the Carrier Common Line (CCL) and Local Switching (LS) charges in question are being appropriately assessed to AT&T and the other interexchange carriers (IXCs).

Clearly, AT&T is an IXC which utilizes local exchange switching facilities and local exchange common line facilities. Nothing in the Commission's rules require that such facilities have to be utilized for each given call at issue. The rules do not say that such charges are to be assessed to IXCs which utilize such facilities for the particular call at issue, but rather that such charges are to be assessed upon IXCs "that use local exchange switching facilities (and common line local exchange facilities) for the provision of interstate...services."

Additionally, the rules specify that LS and CCL charges are to be assessed per "access minute of use", and the rules specify how those minutes of use are to be measured. With respect to the scenarios presented by AT&T the only exception which the Commission has explicitly provided for is where the facility from the end office is a cellular/RCC facility.

BellSouth does not believe that it has the latitude to deviate from the existing Part 69 Rules without a rulemaking. In addition, given the nature of AT&T's request and the industry changes made since divestiture, as well as these forthcoming, BellSouth believes that it is inappropriate to make "piecemeal" changes to the application of these rate elements. Such changes are more appropriately handled within a rulemaking process under the auspices of a more general access reform.

EXHIBIT

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