

BellSouth to implement 11-digit dialing for certain Land to Mobile (LTM) calls. Include a discussion of the feasibility of any alternative measures available for complying with the FCC s ruling. Provide any internal documents BellSouth relied upon to determine proper compliance with this ruling.

2. Are the dialing requirements for any other service providers besides wireless services affected by these changes? If yes, identify the service providers and explain how end-users may be affected.

3. Refer to BellSouth s Wireless Customer Guide, Issue 10, March 3, 2003, Section 4.7, Optional Land to Mobile Service. (Excerpt attached hereto as Attachment A.) This document is available from BellSouth s Interconnection Web Site at www.interconnection.bellsouth.com.

a. See Section 4.7.2. Can the guide numbers and the location routing number be configured in such a way as to allow 10-digit dialing for LTM calls? If not, explain the limitations.

b. Section 4.7.3 mentions the BellSouth standard dialing plan. What is BellSouth s standard dialing plan ?

1) What are the implications when calls conform to this plan?

2) What are the implications when calls do not conform to this plan?

c. Discuss the issue addressed at Section 4.7.3 in the last sentence, stating that a landline subscriber must dial 1 + 10 digits to complete calls to a LTM NXX served by different NPAs. [Emphasis added]. Explain what dialing requirements are contemplated for an LTM NXX served by the same Numbering Plan Area.

4. Refer to BellSouth's notice to the Commission dated June 11, 2003 wherein BellSouth advised the Commission of central office translation errors that occurred when converting LTM calls from 7-digit to 11-digit dialing. According to later filings made by BellSouth, the translations expanded the dialing requirements from 7-digit to 11-digit, but failed to block 7-digit calls.

- a. What are the implications if 7-digit calls remained un-blocked ?
- b. Can 7-digit calls be blocked but 10-digit calls be allowed?

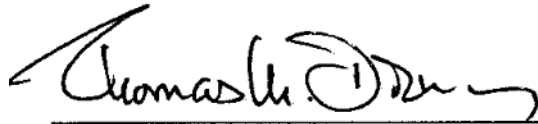
5. In its response, BellSouth advises that the change was made to prepare the network for the implementation of number pooling and porting, while allowing toll calls to be processed by the customer's chosen local toll carrier and maintaining the traditional 1+ dialing plan for toll calls.

- a. Explain why 1+ dialing in this situation must now be maintained when 7-digit dialing was the norm prior to the change.
- b. Was the LTM tariff that allowed 7-digit dialing with reverse toll billing in violation of any rules of this Commission or the FCC?
- c. Would 10-digit dialing be in violation of any such rules?

6. Explain in detail, similar to the explanations provided in BellSouth's response at pages 4-8, how an LTM call from a customer subscribing to Area Calling Service continues to be dialed with 7-digits and with no toll charge billed.

- a. Identify and discuss the specific routing elements utilized by BellSouth to facilitate this type of call.
- b. Compare these elements with those used when routing calls from a customer who does not subscribe to Area Calling Service.

7. Discuss the feasibility of permitting 10-digit dialing for LTM calls only when the wireless service provider subscribes to BellSouth's LTM service with reverse toll billing and the call is therefore carried over BellSouth's toll network to the wireless service provider's switch. If not feasible, identify and discuss the specific limitations that would prohibit this arrangement.



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cc: Parties of Record

CHAPTER 4.0 - Types of Wireless Interconnections and Options

4.7 Optional Land To Mobile Service

4.7.1 Description

Optional Land to Mobile (LTM) service allows a landline subscriber to call a mobile telephone number from any BellSouth end office in the LATA without incurring toll charges.

4.7.2 Service Requirements

In order to satisfy technical billing requirements, BellSouth requires the Wireless Service Provider (WSP) to allocate an entire NXX for LTM services. Optional Land to Mobile can be ordered with a new NXX or it can be added to an existing NXX. The entire dedicated NXX must utilize LTM services.

Once Wireless Telephone Number Pooling is implemented industry wide, WSPs are still required to designate an entire NPA NXX as "Land-to-Mobile enabled" for new codes. However, they may offer Land-to-Mobile calling plans on an individual telephone number basis for pooled and ported numbers. Wireless Telephone Number Pooling will commence November, 2002.

To establish new Land-to-Mobile calling plans, the WSP must establish "guide numbers" as follows:

- For each new NPA-NXX intended for Land-to-Mobile calling plans, the code holder must designate one number (from this NPA-NXX range) as a guide number.
- For pooled-in / ported-in numbers, an additional Location Routing Number (LRN) must be designated for each switch used to provide Land-to-Mobile calling plans. This designated LRN must be established from a Land-to-Mobile NPA-NXX code. Further, a guide number representing the Land-to-Mobile LRN must also be established.

4.7.3 LTM Access

Once Wireless Telephone Number Pooling is implemented, all Land-to-Mobile calls will conform to the BellSouth standard dialing plan. In cases where more than one Numbering Plan Area (NPA) code exists within a LATA, a landline subscriber must dial 1 + 10 digits to complete calls to a LTM NXX served by different NPA(s).

4.7.4 Selective Exchange

Selective Exchange land to mobile allows intra-lata toll calls and expanded local calling area calls from telephone numbers in selected exchanges served by BST and terminating in a CMRS provider's network to be excluded from the originating customer's bill. Land line customers calling from the selective exchange NXX's will not be billed a toll call; as with regular land to mobile service. Usage is collected and billed to the CMRS provider.

Local calls and calls within the basic local calling area are not covered by this plan. Only toll calls and calls within the expanded local calling area are included in this service.