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OCT 10 2003

October 10, 2003

Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

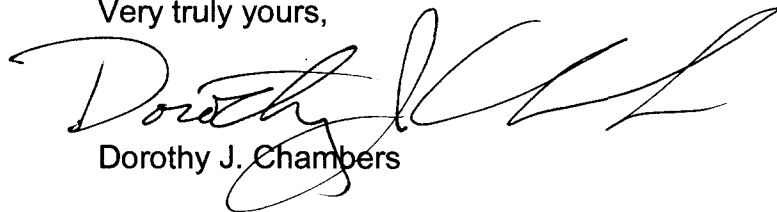
Re: Inquiry Into the Use of Contract Service Arrangements by
Telecommunications Carriers in Kentucky
PSC 2002-00456

Dear Mr. Dorman:

Enclosed for filing in the above-captioned case is the supplemental direct testimony of Michael S. Hayden and John A. Ruscilli on behalf of BellSouth Telecommunications, Inc.

Five paper copies and a CD-ROM of today's filing are provided to the Commission. A CD-ROM is provided to all parties of record.

Very truly yours,



Dorothy J. Chambers

Enclosures

cc: Parties of Record
508260

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the individuals on the attached Service List by mailing a copy thereof, this 10th day of October 2003.


Dorothy J. Chambers

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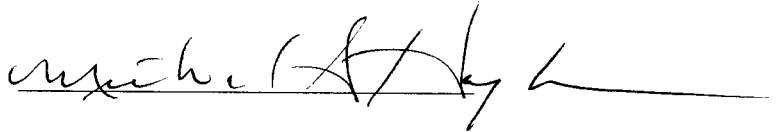
AFFIDAVIT

STATE OF KENTUCKY

COUNTY OF JEFFERSON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Michael S. Hayden, who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in Case No. 2002-00456, Inquiry Into the Use of Contract Service Arrangements by Telecommunications Carriers in Kentucky, and if present before the Commission and duly sworn, his testimony would be set forth in the annexed supplemental testimony consisting of 4 pages and 0 exhibits.



Michael S. Hayden

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 10th DAY OF OCTOBER, 2003

Ineresa E. Alersche Notary Public

My commission expires 7-25-04

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BELLSOUTH TELECOMMUNICATIONS, INC.
SUPPLEMENTAL DIRECT TESTIMONY OF MICHAEL S. HAYDEN
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION
CASE NO. 2002-00456
OCTOBER 10, 2003

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. (“BELLSOUTH”) AND YOUR BUSINESS ADDRESS.

A. My name is Michael S. Hayden. I am employed by BellSouth as Manager – Regulatory & External Affairs for Kentucky. My business address is 601 West Chestnut Street, Louisville, Kentucky 40203

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes, I filed direct testimony April 30, 2003.

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY?

A. The purpose of my supplemental direct testimony is to address an issue raised at the Commission’s industry workshop. This testimony provides information regarding the multiple ways Kentucky’s business customers can, and do, go about finding information about, and selecting, competitive telecommunication

1 services.

2

3 Q. WHAT SOURCES DO BUSINESS CUSTOMERS HAVE TO EVALUATE
4 THEIR CHOICES FOR TELECOMMUNICATIONS SERVICES?

5

6 A. Business customers have various ways to evaluate their choices for
7 telecommunications services. I am most familiar with the way government and
8 education customers purchase telecommunications services. The preferred and
9 sometimes mandated method is the issuance of a Request for Bid (“RFB”) or
10 an (“RFP”). In this type of procurement, typically a weighted “scorecard” is
11 used to make the evaluation. Typical scorecard items include an evaluation of
12 the vendor’s capabilities and an evaluation of the staff resources that will be
13 responsible for project implementation. Generally, the two most important
14 scorecard items are the project design and the project price, which is usually,
15 always weighted the most. My experience has been that 5 to 6 vendors, on
16 average, submit bids. The customer then makes a buying decision based on the
17 best value.

18

19 Q. WHAT OTHER WAYS DO BUSINESS CUSTOMERS HAVE TO
20 EVALUATE THEIR CHOICES FOR TELECOMMUNICATIONS
21 SERVICES?

22

23 A. Customers are now using the Internet to conduct online reverse auctions to
24 obtain all types of services, including telecommunications. The customer
25 usually invites multiple vendors to participate in the auction and issues the

1 auction's rules of conduct in advance. The rules typically define the specific
2 items or services to be bid and the processes to follow. For example, bidders
3 may be required to submit competing bids within a certain time-period and the
4 incremental bid price must be a certain dollar amount below the previous
5 bidder's offer. The Kentucky League of Cities advocates the use of online
6 auctions by its constituents, that is, the cities and towns in Kentucky.

7

8 Q. ARE THERE OTHER WAYS THAT BUSINESS CUSTOMERS
9 EVALUATE THEIR CHOICES FOR TELECOMMUNICATIONS
10 SERVICES?

11

12 A. Yes, the tried and true method is still simply calling multiple service providers
13 and asking them for a price quote. The customer could look in the front of the
14 telephone directory or access the Commission's Web site and call all the
15 telecommunications service providers that are listed. I have had customer calls,
16 asking if I can give them a cheaper price than company X. The customer
17 controls the call, and can leverage one company against another company.
18 Additionally, many telecommunications companies are advertising their
19 promotional prices or advertising prices X percent less than BellSouth's prices.
20 A customer can simply call the advertised number and obtain a price quotation.

21

22 Q. ARE TELECOMMUNICATIONS COMPANIES USING THE WORLD
23 WIDE WEB TO ADVERTISE THEIR SERVICES AND PROVIDE A
24 METHOD FOR CUSTOMERS TO PURCHASE SERVICES?

25

1 A. Yes. BellSouth provides an easy Web interface that business customers can use
2 to obtain information about our products and services. BellSouth provides
3 customers the capability to enter pertinent information and obtain a price
4 quotation or a number to call to speak to a sales associate. I have reviewed the
5 Web pages of many of BellSouth's wholesale customers and I have found that
6 most of them have online capabilities similar to those of BellSouth.

7

8 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

9

10 A. Yes.

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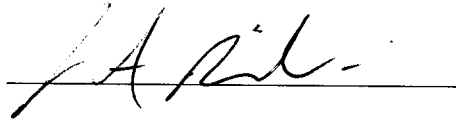
AFFIDAVIT

STATE OF GEORGIA

COUNTY OF FULTON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared John A. Ruscilli, who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in Case No. 2002-00456, Inquiry Into the Use of Contract Service Arrangements by Telecommunications Carriers in Kentucky, and if present before the Commission and duly sworn, his testimony would be set forth in the annexed supplemental testimony consisting of 6 pages and 2 exhibits.



John A. Ruscilli

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 5th DAY OF OCTOBER, 2003



Notary Public

MICHEALE F. BIXLER
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2005

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BELLSOUTH TELECOMMUNICATIONS, INC.
SUPPLEMENTAL DIRECT TESTIMONY OF JOHN A. RUSCILLI
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION
CASE NO. 2002-00456
OCTOBER 10, 2003

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. (“BELLSOUTH”) AND YOUR BUSINESS ADDRESS.

A. My name is John A. Ruscilli. I am employed by BellSouth as Senior Director – Policy Implementation and Regulatory Compliance for the nine-state BellSouth region. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes, I filed direct testimony April 30, 2003 and rebuttal testimony on May 21, 2003.

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY?

A. The purpose of my supplemental direct testimony is to present and support the Joint Industry Proposal for CSA Standards filed with the Kentucky Public Service Commission (“Commission”) on October 8, 2003. The proposal is

1 attached to my testimony as Exhibit JAR-1.

2

3 Q. PLEASE DESCRIBE THE JOINT INDUSTRY PROPOSAL FOR CSA
4 STANDARDS.

5

6 A. In an effort to resolve the issues surrounding use and filing of CSAs in
7 Kentucky, Cincinnati Bell (CBT), ALLTEL Kentucky, Inc. (ALLTEL) and
8 BellSouth submitted a draft Joint Industry Proposal for CSA Standards in
9 advance of the Industry Workshop conducted on October 1, 2003. On October
10 8, 2003, CBT, ALLTEL and BellSouth filed the Joint Industry Proposal with
11 the Commission. The standards apply to all telecommunications companies
12 operating in Kentucky and therefore do not advantage or disadvantage one
13 company or type of telecommunications provider over another. The proposed
14 standards define the circumstances under which a company may use CSAs in
15 order to meet competition or to account for other unique circumstances.
16 Further, the proposed standards streamline the CSA process and eliminate
17 automatic filing requirements, yet retain the ability of the Commission or Staff
18 to review copies of signed contracts and supporting cost information upon
19 request. Finally and importantly, the proposed standards preserve the privacy
20 expectations of customers by redacting the customer name and address on any
21 contract that is requested to be filed for the public record.

22

23 Q. ARE THE STANDARDS CONTAINED IN THE JOINT INDUSTRY
24 PROPOSAL CONSISTENT WITH THE MANNER IN WHICH CSAs ARE
25 HANDLED IN OTHER STATES WHERE BELLSOUTH OPERATES?

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A. Yes. As the local telecommunications market has become more competitive, it is imperative that companies be able to respond quickly to competitive situations in order to obtain or retain a customer's business. Consequently, the use of CSAs in all states in which BellSouth operates has increased significantly. Many states have responded to the need to streamline the CSA process and to ensure that all companies operate under the same CSA standards. For example, not only does BellSouth not file individual CSAs in Florida, in August 2001 the Florida Public Service Commission eliminated even the quarterly CSA report it had previously required. BellSouth only provides cost support data if requested by the Florida Commission. The Louisiana Commission requires that BellSouth file cost data on a CSA only in the event that the CSA is challenged. Similarly, the Mississippi Commission requires CSA support documentation only upon request. Further, the Commissions in Georgia, North Carolina and South Carolina only require a monthly summary of CSA activity; they do not require BellSouth to file individual CSAs. The South Carolina Commission Staff selects three cases to sample and BellSouth provides the contract and cost support for the three selected cases. Although BellSouth provides all CSAs in Alabama to the telecommunications review division, proposals for relaxation of the CSA requirements are currently being reviewed in Alabama Docket No. 28590, Proposed Revisions to the Price Regulation and Local Competition Plan. BellSouth files CSAs in Tennessee, which are effective upon filing.

1 Clearly, the trend is toward reducing the administrative requirements for filing
2 CSAs and not toward making the filing requirements more burdensome. For
3 the Commission's convenience, attached to my testimony as Exhibit JAR-2, is
4 an updated chart entitled "CSA Regulatory Filing Requirements" in which
5 each state's filing requirements are identified. An earlier version of this chart
6 was most recently filed in Kentucky in this docket in response to the
7 Commission's 1st Data Requests as an attachment to Item No. 2.

8

9 Q. DO THE PROPOSED CSA STANDARDS PRESERVE THE PRIVACY
10 EXPECTATIONS OF CUSTOMERS?

11

12 A. Yes, they do. Whether a customer obtains CSA pricing from BellSouth or any
13 other carrier, they should expect that their specific company information will
14 be protected. As I referenced in my direct testimony, Cincinnati Bell reports
15 that the Public Utilities Commission of Ohio retains the confidentiality of
16 customer specific CSA information for two reasons. First, it is not necessary
17 to include customer-identifying information in the public record and second,
18 revealing such information may be contrary to a customer's privacy
19 expectations and may adversely affect a customer's competitive position.

20

21 Q. WHAT PURPOSE IS SERVED BY DISCLOSING CUSTOMER NAME,
22 ADDRESS, AND CSA PRICE?

23

24 A. The only purpose served by disclosing customer name and address information
25 is to provide competitive local exchange companies ("CLECs") with market

1 intelligence information. It is not the function of the Commission to provide
2 sales leads to other telecommunications providers. There is no public interest
3 served by such disclosure. Armed with the customers' name and CSA price,
4 the competitor can resell the CSA at a significant discount with hardly any
5 effort at all. Therefore, providing customer name, address, and CSA prices not
6 only assists competitors in their sales efforts, but also effectively blocks
7 BellSouth from competing. In the final analysis, this harms competition and
8 customers.

9

10 Q. DO STATE COMMISSIONS IN OTHER STATES WHERE BELLSOUTH
11 OPERATES PROTECT THE CSA CUSTOMER INFORMATION?

12

13 A. Yes. With the exception of Kentucky and Tennessee, the other states where
14 BellSouth operates protect the CSA customer information. In those instances
15 where BellSouth would be required to file a summary report or the actual CSA,
16 either BellSouth is permitted to redact or withhold customer information or
17 BellSouth is able to file the information under a proprietary arrangement.

18

19 Q. DOES THE JOINT INDUSTRY PROPOSAL SET THE APPROPRIATE
20 STANDARDS FOR CSAs?

21

22 A. Yes. The Joint Industry Proposal for CSA Standards sets forth a streamlined
23 CSA process that reduces the administrative work for all companies as well as
24 the Commission's Staff, while preserving the Commission's ability to review
25 specific CSAs upon request. The proposed standards broaden the use of CSAs

1 to account for competitive situations and other unique circumstances. Finally,
2 the Joint Industry Proposal is consistent with the trend in other states with
3 respect to filing requirements. BellSouth recommends the Commission adopt
4 the proposed standards for use by all telecommunications companies
5 certificated in Kentucky.

6

7 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

8

9 A. Yes.

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11 DOCs # 507558

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JAE-1

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October 8, 2003

Mr. Thomas M. Dorman
Executive Director
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Frankfort, KY 40602


Re: Inquiry Into the Use of Contract Service Arrangements by
Telecommunications Carriers in Kentucky
PSC 2002-00456

Dear Mr. Dorman:

Enclosed for filing in the above-captioned case is a Joint Motion of BellSouth Telecommunications, Inc., Kentucky ALLTEL, Inc., and Cincinnati Bell Telephone Company for Consideration of a Joint Proposal. By permission of counsel for Kentucky ALLTEL and Cincinnati Bell, I have executed the Motion on their behalf.

One paper copy and a CD-ROM of today's filing are provided to the Commission. A paper copy is provided to all parties of record.

Very truly yours,


Dorothy J. Chambers

Enclosures

cc: Parties of Record

507974

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

INQUIRY INTO THE USE OF CONTRACT SERVICE)	
ARRANGEMENTS BY TELECOMMUNICATIONS)	CASE NO.
CARRIERS IN KENTUCKY)	2002-00456

**MOTION OF BELLSOUTH TELECOMMUNICATIONS, INC.;
KENTUCKY ALLTEL, INC.; AND CINCINNATI BELL TELEPHONE
COMPANY FOR THE CONSIDERATION OF A JOINT PROPOSAL**

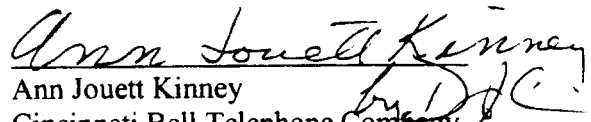
BellSouth Telecommunications, Inc. ("BellSouth"); Kentucky ALLTEL, Inc. ("ALLTEL"); and Cincinnati Bell Telephone Company ("CBT") hereby request that the Commission consider for adoption the Joint Proposal attached hereto. The grounds for this motion are set forth in the attached Memorandum in Support.

Respectfully submitted,



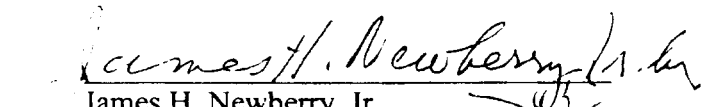
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Attorney for Cincinnati Bell
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Attorney for Kentucky ALLTEL, Inc.

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

INQUIRY INTO THE USE OF CONTRACT SERVICE)	
ARRANGEMENTS BY TELECOMMUNICATIONS)	CASE NO.
CARRIERS IN KENTUCKY)	2002-00456

**MEMORANDUM IN SUPPORT OF MOTION OF BELLSOUTH
TELECOMMUNICATIONS, INC.; KENTUCKY ALLTEL,
INC.; AND CINCINNATI BELL TELEPHONE COMPANY FOR
THE CONSIDERATION OF A JOINT PROPOSAL**

For the reasons set forth below, BellSouth Telecommunications, Inc. (“BellSouth”); Kentucky ALLTEL, Inc. (“ALLTEL”); and Cincinnati Bell Telephone Company (“CBT”) (collectively “Joint Parties”) hereby request that the Commission consider for adoption the Joint Proposal attached hereto. The Joint Proposal sets forth a process to govern the use and filing of contract service arrangements (“CSAs”) by incumbent local exchange carriers (“ILECs”), competitive local exchange carriers (“CLECs”), interexchange carriers (“IXCs”) in accordance with KRS 278.160(1) and KRS 278.512.

As established by the Commission’s orders, this case was opened by the Commission for the purpose of examining the use of CSAs by the telecommunications carriers in Kentucky. In particular, the Commission’s orders have stated that the Commission intends to review the filing requirements for CSAs and the relaxation of those requirements for BellSouth as well as carriers’ use of CSAs in lieu of tariffed rates. The Commission has also stated that it intends to determine standards to limit the use of CSAs, to provide criteria for pricing services, and to consider whether competition should be a factor in determining whether two customers are “similarly

situation” so that they should obtain service at the same rates. A hearing on these matters is currently scheduled for October 23, 2003.

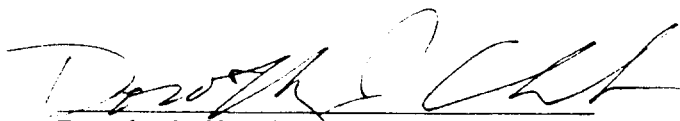
In advance of the hearing, the Commission granted CBT’s request to convene an industry workshop for the purpose of discussing the policy implications surrounding the existing CSA requirements as well as the Commission’s concerns regarding the requirements and carriers’ use of CSAs generally. Prior to the workshop held on October 1, 2003, CBT submitted a draft of the companies’ Joint Proposal attached hereto.

At the workshop, the Joint Parties, other interested parties, and Commission staff engaged in an informative discussion of the myriad issues surrounding CSAs. Among the issues discussed were the Commission staff’s positions with respect to the existing CSA requirements, understanding of the application of the requirements as to CLECs in light of the Commission’s orders in Administrative Case No. 370¹, parties’ concerns regarding the confidentiality of customer identifying information, trends in other states regarding the use of CSAs, various parties’ concerns regarding procedural matters related to the proceeding generally and to the hearing specifically, as well as the draft Joint Proposal. The Joint Parties believe that the industry workshop provided all participants with an opportunity to converse openly and candidly about the proceeding and their respective positions with respect to CSAs. In recognition of some of the concerns about the draft Joint Proposal expressed during the workshop, the Joint Parties have made several changes to the draft. Attached hereto for the Commission’s consideration is a revised Joint Proposal.

¹ Administrative Case No 359; Exemptions for Interexchange Carriers, Long-Distance Resellers, Operator Service Providers and Customer-Owned, Coin-Operated Telephone; and Administrative Case No. 370, Exemptions for Providers of Local Exchange Service Other than Incumbent Local Exchange Carrier; Order dated August 8, 2000.

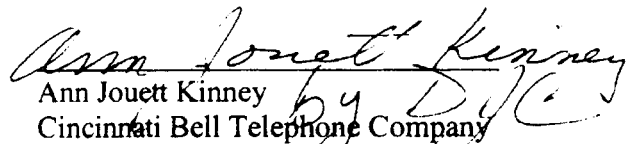
Finally, the Joint Parties would take this opportunity to commend the Commission for convening the industry workshop in this proceeding. Because they believe that the discussion was both useful and informative, the Joint Parties would like to suggest that the Commission encourage the use of the industry workshop process in future proceedings, particularly rulemaking proceedings, where collaboration and discussion would be beneficial to the outcome of the proceeding.

Respectfully submitted,



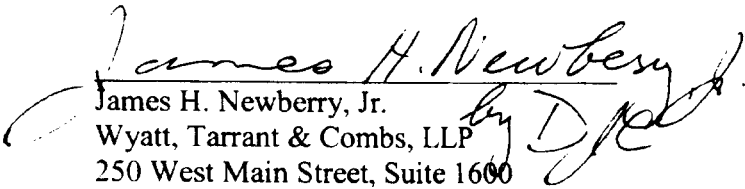
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Attorney for Kentucky ALLTEL, Inc.

Joint Industry Proposal to Kentucky PSC for CSA Standards

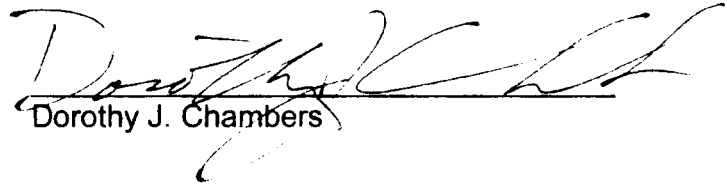
Administrative Case No. 2002-00456

October 1, 2003

1. The following standards apply to all telecommunications carriers providing service in Kentucky – including ILECs, CLECs, and IXCs.
2. The industry recommendation for CSA standards, endorsed by the companies represented as signatories to this proposal, is as follows:
 - a. Companies may enter into contracts (CSAs) in order to meet competition or in other unique circumstances.
 - b. There are no filing requirements for these contracts or supporting information, except that the companies are required to file copies of signed contracts along with supporting cost information upon request from the KPSC or staff. CLECs will not be required to file cost information in support of any CSA.
 - c. If the Commission or staff requests the filing, companies will be allowed to redact the customer name and address on the contract that is filed for the public record. (This provision, which is consistent with the privacy expectations of some customers and protects the contracting company from providing valuable market information to competitors, is the standard in a number of other states served by BellSouth and Cincinnati Bell.)
3. For purposes of these standards, the following are examples of when a carrier may use CSAs in order to meet competition or to account for other unique circumstances:
 - a. A customer has an offer (written or oral) from a competitor or, because of general knowledge of the level of competition in an area or market segment, it is reasonable for a company to believe that a customer has an offer from a competitor;
 - b. Competitive offers have been made to customers in an area or market segment via some form of media or other communication;
 - c. A company determines that it should give a customer a discount for volume and term in recognition of the customer maintaining a specified service or group of services for a specified period of time;
 - d. A company determines that it should give a customer a discount in recognition of the total billed revenue a customer brings to the company or total volume of services purchased by the customer; and
 - e. A company determines that it should give a customer a discount in recognition of the potential that the customer will generate additional revenue by purchasing integrated service packages or bundles.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the individuals on the attached Service List by mailing a copy thereof, this 8th day of October 2003.


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CSA REGULATORY FILING REQUIREMENTS

STATE	CSA FILING REQUIREMENTS	REGULATORY REQUIRED DOCUMENTATION	GENERAL INFORMATION	COST SUPPORT REQ'D	CONTRIBUTION ANALYSIS	FILE COPY OF SIGNED AGREEMENT
AL	Provide a copy of the CSA contract, which includes customer name, contract period, the cost data/summary, revenue data, and the competitive documentation to the PSC after the customer has signed the contract. The same applies to V&T CSAs. CSAs on 1FBs can only be done if they are packaged with a non-basic service or product.	This information is filed as per the General Subscriber Services Tariff A5.6.1B, "Rates, Charges, Terms and additional regulations, if applicable, for the contract service arrangements will be developed on an individual case basis, and will include all relevant costs, plus an appropriate level of contribution. After acceptance by the customer, the Company will furnish the proposal and appropriate support documentation to the Commission at least 15 days prior to implementation." The same wording is in the Private Line Services Tariff B5.7.1B.	CSAs may be offered on any non-basic service in the GSST & in the Private Line Tariff, as defined in Docket 24499, Order dated 9/20/95. CSAs may be offered for a basic service only if the basic service is offered as part of a package w/non-basic services.	Yes	Summary	Submitted to Staff – may be viewed by public if requested and if a proprietary agreement is signed with BellSouth
FL	No longer has to provide anything to the FL PSC for CSAs on an individual basis. However, have to provide cost support when the PSC asks for the documentation. The CSAs must cover the costs. CSAs can be done on 1FBs only if the basic service (1FB) is offered as part of a package with non-basic services.	The elimination of the quarterly CSA report was ordered in Docket No. 010634-TL, Order No. PSC-01-1588-PA-TL approved 8/31/2001.	CSAs may be offered on any non-basic service in the GSST & in the Private Line Tariff, as defined in Docket 24499, Order dated 9/20/95. CSAs may be offered for a basic service only if the basic service is offered as part of a package w/non-basic services.	No, unless requested by the Staff	None	No
GA	Provide a summary of each case on a monthly basis on the Georgia Monthly Filing Report which requires one line of data per case. Under trade secret, provide customer name, customer specific information, a single summary number for revenue, and a single summary number for cost. A nondisclosure agreement must be signed before anyone can look at the trade secret copy. CSAs can also be done on 1FBs as long as it meets the CSA requirements.	The monthly report was based on verbal agreement between BellSouth GA State Regulatory and the GA PSC Staff with verbal agreement from a GA PSC Commissioner in February 2001.	(See Footnote 1) See Footnote 1 & 2	Yes	1 Line of Info per CSA (includes cost & rev)	No

¹ A V&T Agreement is a CSA and is treated as such.

² CSA may be offered on any service in the GSST & in the Private Line Tariff.

CSA REGULATORY FILING REQUIREMENTS

STATE	CSA FILING REQUIREMENTS	REGULATORY REQUIRED DOCUMENTATION	GENERAL INFORMATION	COST SUPPORT REQ'D	CONTRIBUTION ANALYSIS	FILE COPY OF SIGNED AGREEMENT
KY	Provide a summary of each case on a monthly basis on the Kentucky Monthly Filing Report which requires one line of data per case.	This information is filed as per the Order in the Matter of BellSouth Telecommunications proposed changes in Procedures for filing Contract Service Arrangements and Promotions – Case No. 2001-077.	See Footnote 1 & 2.	Yes	1 line of info per CSA (includes cost & rev)	No
LA	CSAs are not filed w/LPSC. However, the PSC requires the Company to maintain the backup and cost support for each case in the event one is challenged. The backup info must meet the PSC standards if challenged. This means that in addition to customer name, location, description of service offered, terms & conditions of the contract, etc., the cost support must demonstrate that the service(s) has/have been offered at a rate level equal to or greater than the cost. Also, for CSAs, the competitive description must support offering the CSA in the first place.	Information regarding requirements is contained in Section A5.6 of the GSSST and B5.7 of the PLST.	See Footnote 1 & 2.	Yes	Yes	No
MS	CSAs are not provided to the Commission but are subject to provision upon request of the PSC, but so far have not been requested.	This information is filed as per the General Subscriber Services Tariff A5.6.1B. The same wording is in the Private Line Services Tariff B5.7.1B.	See Footnote 1 & 2.	No filing is required, but send an email to MS Regulatory indicating the Rate Authorization has been released.	None	No
NC	A list of case numbers with service description for CSAs is filed once a month. Also a generic copy of the CSA contract is filed. For V&Ts and MSA, contracts vary by case, and are filed individually. All Customer specific information, rates and charges are redacted.	The contract information is filed as per the Order Authorizing Price Regulation; DOCKET NO. P-55, SUB 1013, dated 6/2/96. Page 5, Para. VI. B.	See Footnote 1 & 2.	No	None	No

CSA REGULATORY FILING REQUIREMENTS

STATE	CSA FILING REQUIREMENTS	REGULATORY REQUIRED DOCUMENTATION	GENERAL INFORMATION	COST SUPPORT REQ'D	CONTRIBUTION ANALYSIS	FILE COPY OF SIGNED AGREEMENT
SC	Generally, individual contracts and cost information are not furnished to the Commission. Instead, on a monthly basis, the Company provides a list, showing the agreement date and the case number of CSAs signed during the month, to the Commission. The Commission Staff selects three (3) CSAs from this list to sample, and BellSouth provides the Staff with access to these three CSAs and to the revenue/cost information regarding these three CSAs.	S. C. Code Ann. Sec. 39-9-280(f) provides, in pertinent part, that "individual contracts for services or telecommunications services shall not be filed with the Commission, except as required by federal law, provided that telecommunications carriers shall provide access to such contracts to the Commission as required.	See Footnote 1 & 2.	BellSouth provides the Staff with access to the revenue/cost information regarding the three sampled CSAs.	BellSouth provides the Staff with access to the revenue/cost information regarding the three sampled CSAs.	BellSouth provides the Staff with access to the revenue/cost information regarding the three sampled CSAs.
TN	CSAs are filed with the Tennessee Regulatory Authority as tariffs. These filings include an Executive Summary (brief one paragraph summary), and a copy of the actual contract.	The requirement for TRA review and approval of special contracts is set forth in Tariff No. 2003-744.	See Footnote 1 & 2.	No	None	Yes