

BELLSOUTH

W. W. (Whit) Jordan
Executive Director - Federal Regulatory

Suite 900
1133 - 21st Street, N.W.
Washington, D.C. 20036-3351
202 463-4114
Fax: 202 463-4198
Internet: jordan.whit@bcs.bls.com

March 20, 1997

Ex Parte

EX PARTE OR LATE FILED

Mr. William F. Caton
Acting Secretary
1919 M Street NW, Room 222
Federal Communications Commission
Washington, DC 20554

RECEIVED

MAR 20 1997

Federal Communications Commission
Office of Secretary

RE: BellSouth Tariff FCC No. 1, Transmittal No. 385, dated December 11, 1996 and CC
Docket No. 96-128

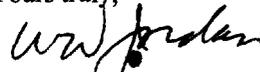
Dear Mr. Caton:

The attached information has been provided by the undersigned at the request of Mr. Jim Lichford of the Common Carrier Bureau's Competitive Pricing Division in connection with the above referenced tariff transmittal. As indicated in this response there are several local exchange features and functions that are used in conjunction or interoperate with the local exchange payphone line. Indeed, many of the features are not payphone specific to payphone lines but rather are essential elements of local exchange services available to all end user customers such as touch tone and directory listing and clearly not elements that would be filed in an interstate tariff.

Further, in identifying these features, it should not be assumed that such features are elements that should be filed in a federal tariff. For example, the directory assistance service that is listed is for intrastate, local directory assistance. Directory assistance provided by LEC's for interstate calls is already tariffed in the interstate access tariff. The charges for such service are assessed to interexchange carriers not end users. Any interstate directory assistance charge that is assessed to an end user is levied by the interexchange carrier. Accordingly, there is no interstate end user directory assistance charge that should be filed.

Another example would be Billing and Collection for Set Use Fee. This feature is an intrastate billing and collection service. Even assuming *arguendo* that there is an interstate component to this function, interstate billing and collection has been found not to be a common carrier service. Accordingly, there can be no federal tariff requirement for such a feature.

Yours truly,



W.W. Jordan
Executive Director - Federal Regulatory

Attachment

cc: Mr. J. Lichford

No. of Copies rec'd
List ABCDE

0+1

RESPONSES TO QUESTIONS FROM THE COMPETITIVE PRICING DIVISION RECEIVED 3-14-97

1. Did BellSouth file every feature and function that the LEC Payphone Operations are using (whether or not the payphone operations are in a separate affiliate). If not, what state tariffed features and functions are available that are not in the interstate tariffs? These features and functions should include those that are payphone related and those that are not.

Because there are no additional network based payphone specific features and functions utilized by BST, there is nothing to be filed in the federal tariff. However, BST's payphone operation does utilize additional services from its Local Exchange Services tariffs that are available to other local exchange service customers. These local exchange common line type services, listed below, were naturally not filed in the interstate tariff.

- A. Directory Assistance Service - Non chargeable in all states
- B. Billing & Collection for Set Use Fee - Non Chargeable; (available in AL, FL, GA, KY)
- C. Directory Listings - Non chargeable in all states
- D. TouchTone Service - Non chargeable in all states
- E. Coin Refund and Repair Referral Service - Non chargeable in all states

These services and features will be chargeable to BellSouth's payphone affiliate, as described for Independent Payphone Providers in the response to Item No. 2 below, beginning April 1, 1997 when BellSouth's payphone operations are moved to a separate affiliate

2. Did the BellSouth file every feature and function that an Independent Payphone Provider has available to it in a state tariffs? If not, what tariffed features and functions are available that are not in the interstate tariffs? These features and functions should include those that are payphone related and those that are not.

No. BellSouth did not file additional non-basic payphone related local exchange services in the interstate tariff. Listed below are the additional, non-basic local exchange services not available in the interstate tariffs which are available to the IPPs

- A. Directory Assistance Service - Chargeable in KY, AL, NC, SC, LA; (available in all states)
- B. Billing & Collection for Set Use Fee - Chargeable in AL, GA, KY; (non chargeable in FL)
- C. Directory Listings - Non chargeable in all states except in KY
- D. TouchTone Service - Chargeable in KY, LA, NC, TN; (available in all states)
- E. Local Usage Detail - Chargeable; (not available in GA & LA)
- F. Answer Supervision - Chargeable; (available in FL only)
- G. Coin Refund and Repair Referral Service - Chargeable in all 9 states

Non-payphone related services not available in the interstate tariff include the balance of all other services available in the states local exchange services tariffs.

3. Under questions #1 and #2, did BellSouth file both chargeable and non-chargeable options as features and functions? If not, what features and functions are available that are not in the interstate tariff? These features and functions should include those that are payphone related and those that are not.

See detailed responses to Questions No. 1 and No. 2.

4. Did BellSouth file both existing features and functions as well as new features and functions?

Based on BellSouth's understanding that this question refers to federal tariff filings, the answer is that BellSouth filed neither existing nor new features and functions, based upon BellSouth's

understanding of the orders. It is BellSouth's understanding that the orders required federal tariff filings only for those features which are network based and payphone specific and used by BellSouth's payphone affiliate.