

BELLSOUTH

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Executive Director-
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July 30, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

RE: Competitive Service Safeguards For Local Exchange Carrier Provision of
Commercial Mobile Radio Services, WT Docket 96-162 **Ex Parte**

Dear Mr. Caton:

The attached document is additional information in reference to the discussion held on July 28, 1997 with representatives of BellSouth Corporation and Suzanne Toller of Commissioner Chong's office. The document represents a comparative analysis of CMRS and long distance safeguard structures.

Notification of the aforementioned meeting was dutifully filed with your office on July 29, 1997. Please associate the accompanying material with the docket proceeding.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,



Ben G. Almond
Executive Director - Federal Regulatory

Attachment

cc: Suzanne Toller

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CMRS SAFEGUARDS

LONG DISTANCE SAFEGUARDS

Requirement	Current PCS Rule	Current FCC Collateral Rule	Option 2	Comparative PCS or RBO	Comparative LDC or RBO
Shared Officers	Yes	No	Yes	Yes	No
Shared Operating, Marketing, and I&M Personnel	Yes	No	Yes	Yes	No
Joint Ownership of Facilities	Yes	No (for computer and transmission facilities)	No (for transmission and switching facilities used to for provision of local exchange service)	No (for transmission or switching facilities)	No (for transmission and switching or bldgs in which located)
Joint Physical Space	Yes	No*	Yes	Yes	Yes
Joint Billing	Yes	Yes	Yes	Yes	Yes
CMRS/LD Entity May Own Landline Facilities	Yes	No	Yes	Yes	Yes
Telco Sale/Promotion of affiliate's CMRS/LD	Yes	Yes	Yes	Yes	Yes
Shared Administrative Services	Yes	Comptrollers, finance, legal, H.R., security*	Yes	Yes	Yes (except neither can perform operations or I&M on other's facilities)
Joint R&D	Yes	Yes	Yes	Yes	Yes
Separate Corporate Entity Required	No	Yes	Yes	Yes	Yes
Separate Books of Account Required	No	Yes	Yes	Yes	Yes
Must Obtain Telco Communications Services Under Tariff**	Yes (as a result of imputation)	Yes	Yes	Yes (except that affiliate may also enter into Section 252 agreement)	Yes
Provide CPNI to CMRS/LD Entity Subj. to Disclosure	Open	Yes	Open	Open	Open

* Based on FCC interpretations.

** The CMRS/LD affiliate should also be permitted to purchase unbundled network elements.