



Robert H. Castellano  
Director  
Federal Government Affairs

Room 1133M1  
295 North Maple Avenue  
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August 13, 1997

RECEIVED

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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: Ex Parte Presentation, CC Docket No. 96-128

Dear Mr. Caton:

Today Richard Rubin and I, representing AT&T and Mary Sisak of MCI, met with Michael Carowitz, John Muleta, Greg Lipscomb, Jennifer Myers, Bob Sprangler and Al Barna, all of the Common Carrier Bureau in the above-captioned docket. Specifically, we discussed the response of AT&T and MCI to the LEC ANI Coalition Ex-Parte dated June 16, 1997. The attached document formed the basis of the discussion.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Attachments (2)

cc with attachment to:

- M. Carowitz
- J. Muleta
- G. Lipscomb
- J. Myers
- B. Spangler
- A. Barna

No. of Copies rec'd 021  
List ABCDE

August 13, 1997

Response of AT&T and MCI to LEC ANI Coalition Ex Parte Dated  
June 16, 1997

This document responds to the ex parte filing of Michael K. Kellogg filed on behalf of the LEC ANI Coalition on June 16, 1997. That filing attached a document entitled "Whitepaper on the Provision of ANI Coding Digits" ("White Paper"). As demonstrated below, the White Paper is either wrong or misleading in many important respects. First, it is wrong in assessing the IXCs' motives and analyzing the Commission's Payphone Orders, especially the Reconsideration Order. More significantly, however, the White Paper is wrong in proposing "solutions" for how ANI coding digits will be made available to paying carriers that either directly violate the Commission's Reconsideration Order, or -- as revealed by a July 28 submission from USTA -- cannot be implemented by the LECs. Indeed, it now appears, less than 60 days before the scheduled implementation date for per-call compensation, that the LECs have no viable plans to transmit specific ANI coding digits that identify payphones.

I. Carriers Are Working Diligently To Comply With The  
Commission's Tracking Requirements

The White Paper's assertion (p. 1) that large IXCs "appear[ to be] simply stalling" in implementing the tracking needed for per-call compensation is simply false. AT&T and other carriers have been working diligently to redesign their systems to enable them to track calls from payphones, including "subscriber 800". These calls are new to the compensation system, and they represent the majority of the calls for which compensation will be due. AT&T and other carriers clearly stated in the record that major systems changes were necessary to enable them to track subscriber 800 calls, which are provided using completely different switching platforms and networks from dialaround operator services calls, including calls placed using access codes such as 1-800-CALL-ATT and 1-800-COLLECT. Thus, the White Paper's references to such 800 number-based access codes and carriers' ability to track calls using those codes are at best misleading and in all events irrelevant when referring to the new capabilities needed to track 800 subscriber calls.<sup>1</sup>

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<sup>1</sup> For example, the White Paper's reference (p. 5) to the AT&T waiver relating to dialaround compensation cannot be equated to the work AT&T must do to track subscriber 800 calls from payphones.

It is also unreasonable to assume, as the White Paper does, that carriers such as AT&T or MCI would use the same tracking mechanisms as smaller carriers such as Telco, which is not a facilities-based carrier throughout the country and thus would not have to track calls from most of the more than 2 million payphones. In all events, carriers such as Telco carry relatively small amounts of dialaround and 800 subscriber traffic. In contrast, AT&T and MCI collectively carry hundreds of millions of calls daily over their networks and must analyze all such calls in order to calculate per-call compensation.

II. Reliance On Receipt Of The "07" Code Is Inconsistent With The Commission's Orders And Not Currently Possible For Some Carriers

Contrary to the White Paper's claims (p.2), reliance on the LECs' transmission of a "07" code for payphone calls is inadequate for several reasons. First, paragraph 64 of the Reconsideration Order specifically clarifies the requirements for the passing of ANI digits:

"Once per-call compensation becomes effective, we clarify that, to be eligible for such compensation, payphones will be required to transmit specific payphone coding digits as part of their ANI, which will assist in identifying them to compensation payors. Each payphone must transmit coding digits that specifically identify it as a payphone, and not merely as a restricted line." (emphasis added)

This clarification was adopted in response to the arguments in MCI's Petition for Reconsideration (p. 14) which noted that if IXCs only receive the 07 code "they will be required to incur the additional expense of a LIDB query for every '07' call in order to identify those '07' calls that originate from payphones." The language in the Reconsideration Order could not be clearer in rejecting the use of ANI coding digits that require payors to do additional processing of any kind to identify payphone calls for purposes of paying per-call compensation.

The White Paper (p. 3) itself expressly recognizes that the 07 code "indicates that the call originated on a restricted line," and it does not dispute that restricted lines include more than just payphone lines. Indeed, the White Paper (id.) acknowledges that carriers who receive the 07 information would only know "potential payphone calls" and would have to do additional processing to track payphone

calls. Thus, any assertion that LECs need only transmit the 07 code for payphone calls is directly contrary to the specific requirements in the Reconsideration Order.<sup>2</sup>

The White Paper's repeated references to the OLS Order in connection with LIDB dips are thus irrelevant for two reasons. First, there is no legal or policy basis for imposing on carriers the additional cost of paying LECs for hundreds of millions of LIDB dips annually in order to track and pay the LECs and other PSPs hundreds of millions of dollars in per call compensation.<sup>3</sup> More fundamentally, however, only the orders in this proceeding -- and for this issue only the Reconsideration Order -- define the obligations of LECs, PSPs and paying carriers with respect to payphone compensation.

In all events, AT&T and MCI's toll-free switches are not currently interconnected with LIDB databases. A LIDB-based system would require significant network reconfiguration costs and take additional time for carriers to implement.

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<sup>2</sup> It would also be unreasonable to require carriers to store data regarding all calls they receive that carry the 07 code, preserve that data until the LECs send quarterly lists of payphone telephone numbers and then match the data against the lists to screen out payphone originated calls (see White Paper, pp. 2-3). We expect that AT&T's and MCI's toll-free services networks could receive tens of millions of 07 calls daily and that we would have to incur significant additional costs to enable our systems to make such comparisons. Moreover, this type of after-the-fact matching process would not provide carriers with the real-time information they need to bill customers on a timely basis for payphone compensation costs and to offer customers the option of blocking payphone originated calls.

<sup>3</sup> The LECs' financial incentives for sending the 07 code are readily apparent from the White Paper's acknowledgment (p. 13) that PSPs are moving increasingly to the use of "smart" payphones for which they would send the 07 identifier. This would only increase the number of LIDB queries that carriers would have to pay to LECs in order to track per-call compensation for the LEC and independent PSPs. Further, the identification of a call as a payphone call through the use of a LIDB dip during call set-up does not assure that compensation will be due, because a large percentage of call attempts (up to 35% or more during busy hours) are not completed.

III. LECs Have Not Indicated How They Will Comply With The Commission's Requirement That They Must Offer PSPs The Ability To Transmit Specific Payphone Identification Digits

As noted above, the Reconsideration Order expressly provides that PSPs who do not transmit specific payphone codes will not be eligible to receive per-call compensation. The order also provides that LECs must make this capability available to PSPs through a tariffed service. AT&T and MCI are not aware of any tariffs that make this capability available to PSPs. Moreover, it now appears that most LECs will not be able to transmit specific payphone coding digits by October.

AT&T and MCI (and, we believe, other carriers) have built systems that will enable our switches to track calls placed from payphones that rely on receipt of the 27 code (for calls from "dumb" payphones) and the 29 and 70 codes assigned to identify prison and "smart" payphones, respectively. We will be prepared to receive and track payphone calls transmitting those codes as of October 7.<sup>4</sup> However, if we do not receive these codes (particularly the 29 and 70 codes), we will be unable to track such calls, and the order does not require us to pay for any calls that do not deliver this information.

We were surprised to learn, through a July 28 ex parte filing of USTA,<sup>5</sup> that most LECs are unable to pass the ANI coding digits of 29 and 70, through Flex ANI or any other means. According to USTA (p. 5), only about 3,000 of the existing 26,000 LEC end offices are currently equipped to provide Flex ANI coding digits. In addition, AT&T received a letter last week from BellSouth (Attachment 1 hereto), in which BellSouth states that it only intends to provide carriers with the 27 code (for "dumb" payphones) and 07, and that its plans for implementing other ANI coding digits are "on hold." Perhaps this is the reason why the White Paper fails to indicate that all (or even most) of the LEC ANI Coalition members would be able to fill industry-wide needs for Flex ANI by October. In all events, contrary to the

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<sup>4</sup> AT&T has been able to overcome previously identified technical problems associated with the receipt of Flex ANI codes.

<sup>5</sup> Letter from Keith Townsend, Director, Regulatory Affairs & Counsel, USTA to William F. Caton, FCC, CC Docket No. 96-128, dated July 28, 1997.

White Paper's implications, Flex ANI is not a viable short term solution for the industry.<sup>6</sup>

Moreover, the White Paper (p. 8) is wrong that LECs would be required to provide the payphone-specific ANI information for free. Again, reference to paragraph 64 of the Reconsideration Order provides a full answer:

"LECs must make available to PSPs, on a tariffed basis, such coding digits as a part of the ANI for each payphone" (emphasis added).

Thus, contrary to the White Paper's unfounded assertions (p. 9), the Reconsideration Order expressly requires that PSPs, not carriers, pay for the delivery of the necessary identification digits. Accordingly, LECs should be required to be prepared to flow these payphone specific digits through to carriers by October 7, and include any associated costs in the rates they charge PSPs for this capability.

Given the clear language of the Commission's order, the White Paper's assumption that carriers should be required to pay for the connectivity to Flex ANI is mistaken. To our knowledge, no carrier has yet ordered Flex ANI, and neither AT&T nor MCI has any other plans to use Flex ANI. Thus, if carriers were required to pay to implement Flex ANI, all of those costs would have to be considered additional costs of implementing the payphone compensation requirements and assessed against customers as such.<sup>7</sup>

The LECs' effort to require carriers to subscribe to a hugely expensive LEC service they do not otherwise want solely for the purpose of obtaining the information they need to determine which calls are placed from payphones is proscribed by the Reconsideration Order for the same reason

<sup>6</sup> We also note that if the LECs' proposals for dealing with this problem would require carriers to undertake additional systems development, we would be unable to meet an October 7 tracking date.

<sup>7</sup> Under current LEC tariffs, carriers would have to pay LECs in the range of \$500 to \$1500 per end office per carrier identification code ("CIC"). There are over 20,000 LEC end offices nationally, and most larger carriers have more than one CIC. We estimate that it could cost AT&T and MCI together tens of millions of dollars to order Flex ANI, which, as noted above, would be solely for the benefit of PSPs.

that LIDB data dips are proscribed. The Commission clearly ruled that payphones must transmit the specific digits that identify payphones, and it foreclosed efforts to require carriers to purchase additional information to perform call tracking. It would be highly inequitable to require carriers -- who must already bear the cost of tracking and paying PSPs -- to spend additional tens of millions of dollars to buy unwanted services from the LECs solely for the purpose of complying with these obligations.

IV. Customers Demand The Ability To Block 800 Subscriber Calls From Payphones.

The White Paper's efforts (p. 6) to minimize the importance of blocking of payphone calls is puzzling, given the Commission's ruling that IXCs are entitled to -- and carriers are expected to -- develop the capability to selectively block calls from payphones. It will be impossible to develop such a capability unless specific ANI codes that identify payphones are passed at the start of each call. MCI is thus correct that IXCs need to have access to payphone-specific ANI digits in order to be able to develop the ability to block calls from payphones.<sup>8</sup> Moreover, the White Paper's speculation (*id.*) on 800 subscribers' interest in rejecting calls from payphones is just that. The imposition of per-call compensation will significantly increase the average cost of a call for 800 subscribers. AT&T's and MCI's direct experience with customers since the beginning of the new payphone compensation regime is that customers do not want to pay such charges unless they also have the right to block payphone calls.<sup>9</sup>

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<sup>8</sup> The White Paper (*id.*) is also wrong that AT&T has no plans to charge 800 subscribers for calls from payphones on a per-call basis when its internal systems are able to do so.

<sup>9</sup> For example, AT&T recently filed several Tariff 12 plans where customers demanded that a blocking option be provided. See AT&T FCC Tariff No. 12 Option 14 (effective August 1, 1997), Option 31 (effective June 19, 1997) and Option 168 (effective August 1, 1997).

BellSouth Interconnection Services 770 492-7550  
Suite 410 Fax 770 621-0629  
1960 West Exchange Place  
Tucker, Georgia 30084

AT&T Regional Account Team

August 6, 1997

Milford Stanley  
Manager - AT&T  
FLOC 12N24, Promenade II  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309

Dear Milford,

We acknowledge your recent request for the assignment of two additional ANI II digits and associated testing to facilitate implementation of a per call compensation process by October 7, 1997. BellSouth's interpretation of the recent FCC pay phone order (Docket 96-128) is that no new ANI coding is required for implementing per call compensation. Therefore, BellSouth's testing plans are on hold while the issue is being debated.

Currently, BellSouth provides ANI code 07 which indicates a "coinless" call originating from a hospital as well as inmate services. Code 27 identifies the originating call as a coin call. These codes used in conjunction with the periodic list of all pay phone telephone numbers to Interexchange Carriers should provide the necessary information for implementing per call compensation.

On August 1, BellSouth introduced a new service offering (pursuant to Docket 91-35) that will provide information about calls originated from screened lines. As contemplated by the Commission, customers may use the information to determine how calls should be handled to minimize fraudulent calls. This new offering is called *Enhanced Originating Line Screening Service (EOLS)*. EOLS is a new SS7 database service which will show the type of originating line involved. I am enclosing a copy of the service description and tariff pages for your review.

As volatile as the industry is today, I will definitely advise you if our position changes. If you would like to discuss, please call me at 770 492-7583.

Sincerely,



Jocelyn Bivins  
Manager

Enclosures

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# BELLSOUTH

## Enhanced Originating Line Screening (EOLS) at a Glance

- Wholesale service which provides new Service or Equipment Indicator payphone codes to other carriers (e.g., IXCs, OSPs).
- Queries from carriers utilize IN-LIDB protocol via SS7 to request service indicator information for a specific calling number.
- This service is mandated by the Third FCC Report and Order (April, 1996) based on docket CC 91-35.
- Full deployment version also contains fields which can be used by BST Operator Services for customized branding and routing of re-sold lines.

### 1. Introduction

#### 1.1. Service overview and history

There are certain types of business lines which are not allowed to originate "sent-paid"<sup>1</sup> toll calls. Such lines, including Independent Payphone Provider lines, Hotel/Motel lines, and Inmate lines, are only allowed to place toll calls using an alternate billing method. The ability to control originating toll charges is called Originating Line Screening (OLS), and is available for most types of business lines.

However, when such a call is delivered to a service aggregator such as an Interexchange Carrier (IXC) or Operator Service Provider (OSP), no distinction is made between the call types listed; they all are classified under the (default) Information Indicator (II) code of 07, which only identifies the call as requiring "Special Operator Handling; Coinless/Hospital/Inmate."

##### 1.1.1. FCC order

In its Third Report and Order on April 5, 1996, the FCC required Local Exchange Carriers (LECs) to provide expanded Automatic Number Identification Information Indicator codes (ANI II digits) for such calls.

This service is intended to be offered under a federal tariff. The service is referred to as Enhanced Originating Line Screening (EOLS).

##### 1.1.2. FCC Solutions

The FCC has identified two acceptable methods that LECs may use to provide this information: a switch-based solution referred to as Flex ANI, and a line information database solution referred to as LIDB.

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<sup>1</sup>. The term "sent-paid" refers to calls for which the payment for the call has already been arranged at the origination point of the call. The most common example is a direct-dialed call from a non-screened business number.

Full Deployment

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For comparison, the Appendix contains a description of the two solutions, and a brief evaluation of each solution. These are included as background for the AIN proposal which follows.

### 1.1.3. Additional OLNS capabilities

In support of these and other FCC requirements, Bellcore has defined a new set of LIDB messages, Originating Line Number Screening (OLNS) messages. These messages are supported by corresponding fields in the LIDB database. OLNS messages include the calling number in the query, and the returned response includes one or more fields. The primary fields of interest in this service concept are the Service or Equipment Indicator (SOE), and the Account Owner-Service Provider Identifier (AO-SPID).

### 1.1.4. Support for BellSouth TOPS platforms

There are approximately 40 operator services switches (Nortel TOPS switches) in the BellSouth region. These switches support a variety of billing and routing services. The addition of the OLNS capability will provide for customized branding and routing as required in the competitive local exchange environment.

## **1.2. Proposed AIN solution summary**

This service concept proposes that an AIN-based version of the LIDB solution be used to provide the EOLS service. Such a solution would be virtually transparent to subscribing carriers, having the same characteristics as the LIDB solution.

The client for this service is the Interconnection COU. Customers will be Interexchange carriers and Operator Service Providers.

## **1.3. Full deployment limitations**

- There will be no carrier subscriptions for the full deployment version of this service. Carrier use of this service will be restricted by STP translations.
- Carriers will receive the SOE screening code.
- The database will be designed to allow all OLNS fields. However, only the SOE field will be populated by processes defined for this full deployment phase. NOTE: this means that BST TOPS switches will not be able to use full OLNS capability with this version of the service.

## 2. Service Description

### **2.1. Value statement**

Since the service is mandated by the FCC, traditional market drivers are supplemented by other technical, operations and future expansion considerations. In addition to providing the OLS service at a lower overall cost (including operations and support costs), an AIN solution offers the following potential evolutionary benefits:

1. BellSouth's corporate direction for intelligent services supports use of the flexible, multi-purpose family of platforms (currently exemplified by the Lucent A-I-Net line of products.)
2. Providing the EOLS service on BellSouth's AIN platform provides a possible growth path for future LIDB capabilities and enhancements.
3. New services under consideration (e.g., Calling Party Pays and Intercept Call Completion) can potentially make use of a line information database to identify calling party station type for billing purposes.

## Enhanced Originating Line Screening

### Full Deployment

## **BELLSOUTH**

4. Investing in a solution that allows BellSouth to further utilize existing AIN development and support capabilities makes good business sense.
5. The use of AIN platforms opens the door to cost-effective and timely enhancements such as customized routing and branding.

### **2.2. EOLS Service Features**

The EOLS service consists of accepting LIDB OLNS queries sent from subscribing carriers (including BST), looking up the Calling Number in the EOLS database, and returning the correct Service and Equipment Indicator in the response message. In addition, for queries from BST switches, the AO-SPID information will also be returned.

In addition to the Service and Equipment EOLS parameters, the database will be designed to accept the complete set of OLNS parameters, including:

- Originating IC (OIC)
- Originating International Carrier (OINC)
- Service or Equipment Indicator (SOE)
- Originating Billing Service Indicators
- Foreign Language Indicator

See section 3.1.3 for additional parameter information.

### **2.3. Service administration**

There are four administration functions required for EOLS; the first two are transitional and the remaining two are on-going.

#### 2.3.1. Initial screening information mapping

Each TOPS switch contains its portion of the existing screening database, SPLDNID. Each SPLDNID contains a list of screened telephone numbers; each number has an associated 2-digit code indicating the type of screening. This information will be converted to a list of numbers and an associated Service or Equipment (SOE) indicator. This list will be read into the EOLS SCP database before the beginning of EOLS service availability.

#### 2.3.2. Initial AO-SPID information entry

The EOLS SCP database must also be populated with resold telephone number and their associated AO-SPID information. Whether this is a database conversion or direct manual or semi-automated entry requires further study.

#### 2.3.3. Ongoing provisioning of screened numbers

Whenever a service provider (e.g., IPP), adds or modifies the screening status for a phone line, the EOLS SCP database must be updated accordingly.

#### 2.3.4. Provisioning of EOLS carrier subscriptions

The customer (IXC or OSP) subscription will be provisioned by translations on the appropriate STPs. Each subscribed carrier will be enabled to send and receive query and response messages for the OLS

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## Enhanced Originating Line Screening

### Full Deployment

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translation type. There will be no carrier subscriptions in the SCP. The SCP will assume that any EOLS query received is an authorized query.

Future developments may include the ability to support multiple subscription profiles to allow carriers to purchase different levels of service.

### 2.3.5. Other provisioning

Administration of other OLNS parameters is not specifically included in this service concept. These capabilities can be added in response to market demand or regulatory requirement.

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BY: Operations Manager - Pricing  
29657, 675 W. Peachtree St., N.E.  
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ISSUED: AUGUST 1, 1997

TARIFF F.C.C. NO. 1  
6TH REVISED PAGE 75.2  
CANCELS 5TH REVISED PAGE 75.2  
EFFECTIVE: AUGUST 16, 1997

ACCESS SERVICE

REFERENCE TO OTHER PUBLICATIONS (CONT'D)

The following publications, referenced in this tariff, may be obtained from BellSouth Telecommunications, Inc., Regional Documentation Coordinator, North W5A1, 3535 Colonnade Parkway, Birmingham, AL 35243.

TR-73575 Issued: February, 1994	Available: February, 1994
TR-73575, Addendum 1 Issued: November, 1994	Available: November, 1994
TR-73583 Issued: November, 1994	Available: September, 1994
TR-73592 Issued: June, 1995	Available: June, 1995
TR-73593 Issued: December, 1995	Available: May, 1996
BellSouth Enhanced Originating Line Screening (EOLS) Technical Reference TR-73604 Issued: July, 1997	Available: August, 1997

(N)	(x)

The following technical publications, referenced in this tariff, may be obtained, and are available under a licensed protocol, from Northern Telecom, Attn.: Frank Vallone, 97 Humboldt Street, Rochester, N.Y. 14609.

Northern Telecom Document Q210-1 Version AI07  
NTDMS/CCIDAS System Application Protocol

Northern Telecom Document CSI-2300-07  
Universal Gateway/Position Message Interface  
Format Specification

Northern Telecom Document 355-00424  
Gateway/Interactive Voice Subsystem  
Protocol Specification

The following technical publication, referenced in this tariff, may be obtained from AT&T, P.O. Box 19901, Indianapolis, Indiana 46219.

AT&T Document 250-900-535, Issue 0003.00 Operator Services Position System Listing Service Issued: July, 1992	Available: July, 1992
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BELLSOUTH TELECOMMUNICATIONS, INC.  
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ISSUED: AUGUST 1, 1997

TARIFF F.C.C. NO. 1  
ORIGINAL PAGE 13-76.7

EFFECTIVE: AUGUST 16, 1997

ACCESS SERVICE

13 - Additional Engineering, Additional Labor and Miscellaneous (N)  
Services (Cont'd) (N)

13.3 Miscellaneous Services (Cont'd) (N)

13.3.19 Enhanced Originating Line Screening (EOLS) Service (N)

(A) General Description (N)

Enhanced Originating Line Screening (EOLS) Service provides information (N)  
about calls originated from screened lines. The EOLS Service is (N)  
transaction-oriented and consists of accepting Originating Line Number (N)  
Screening (ONLS) queries sent from subscribing carriers, accessing the (N)  
Calling Number information in the EOLS data base, and returning the (N)  
Service or Equipment Indicator (SOE) stored in the data base. (N)

(B) Obligations of the Telephone Company (N)

(1) General (N)

The Telephone Company will designate the EOLS Location(s) at which (N)  
EOLS Service is provided in the NATIONAL EXCHANGE CARRIER (N)  
ASSOCIATION, INC. TARIFF F.C.C. 4. The EOLS Location(s) is the (N)  
Signal Transfer Point (STP) and its associated Point Code to which (N)  
the EOLS query will be sent. The EOLS Location(s) will respond to (N)  
queries received in the required signaling protocol for messages (N)  
formatted in the American National Standards Institute specification (N)  
of Signaling System No. 7 (ANSI SS7) protocol. (N)

(2) Transport (N)

Transmission facilities and transport terminations between the (N)  
Signaling Point of Interface (SPOI) of the ordering customer and the (N)  
EOLS Location and between the EOLS Location and the Service Control (N)  
Point (SCP) represent two-way, diversified digital transmission paths (N)  
from the customer SPOI to the SCP, via a Telephone Company designated (N)  
EOLS Location. This transmission path transports queries from the (N)  
SPOI to the SCP and responses to the SPOI from the SCP in the SS7 (N)  
protocol. The technical specifications for the interface required at (N)  
the customer SPOI are provided in the BellSouth EOLS Technical (N) (x)  
Reference (TR-73604) document. (N) (x)

(3) EOLS Data Specifications (N)

The Telephone Company's EOLS database will contain a record for every (N)  
working line number identified by the Telephone Company as having a (N)  
call screening code assignment. (N)

The Telephone Company will update the EOLS information; e.g. add, (N)  
delete, and modify customer accounts as customers move or order new (N)  
service as appropriate. (N)

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- 13 - Additional Engineering, Additional Labor and Miscellaneous Services (Cont'd) (N)  
(N)
- 13.3 Miscellaneous Services (Cont'd) (N)
- 13.3.19 Enhanced Originating Line Screening (EOLS) Service (Cont'd) (N)
- (B) Obligations of the Telephone Company (Cont'd) (N)
- (4) EOLS System Management (N)
- The Telephone Company will administer its EOLS to insure the provision of acceptable service levels to all customers of the Telephone Company's EOLS Service. During periods of system congestion, call gapping procedures may be utilized to control such congestion. (N)  
(N)  
(N)  
(N)  
(N)
- (C) Obligations of the Customer (N)
- To obtain EOLS Service, the customer must utilize at least two (2) CCS7 Signaling Connections and at least two (2) CCS7 Signaling Terminations to interconnect the customer's SPOI and the Telephone Company-designated EOLS Location. (N)  
(N)  
(N)  
(N)
- The customer and the Company shall cooperatively determine the number of additional transmission paths needed, if any, for EOLS Service. (N)  
(N)
- The customer's facilities at the customer's SPOI shall provide the necessary capability to send queries and receive responses in the American National Standards Institute specifications of Signaling System No. 7 (ANSI SS7) protocol. (N)  
(N)  
(N)  
(N)
- The customer will cooperatively test with the Telephone Company at the time of installation the parameters as specified in the BellSouth EOLS Technical Reference (TR-73604) document. (N)  
(N) (x)  
(N) (x)
- (D) Ordering Requirements and Payment Arrangements (N)  
(N)
- (1) Minimum Periods
- The minimum period for which services are provided is as set forth in Section 2.4.2 preceding. (N)  
(N)
- (2) Moves (N)
- Moves will be treated as set forth in 6.7.7 preceding, and all associated nonrecurring charges will apply. Minimum period requirements will be established at the new location as set forth in 6.7.7 preceding. In addition, all outstanding minimum period charges for the discontinued service will apply. (N)  
(N)  
(N)  
(N)  
(N)
- (x) Issued under the authority of Special Permission No. 97-236.

BY: Operations Manager - Pricing  
29G57, 675 W. Peachtree St., N.E.  
Atlanta, Georgia 30375  
ISSUED: AUGUST 1, 1997

ORIGINAL PAGE 13-76.9

EFFECTIVE: AUGUST 16, 1997

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13 - Additional Engineering, Additional Labor and Miscellaneous Services (Cont'd) (N)  
(N)

13.3 Miscellaneous Services (Cont'd) (N)

13.3.19 Enhanced Originating Line Screening (EOLS) Service (Cont'd) (N)

(E) Rates Regulations (N)

The following rate elements apply to EOLS Service: (N)

(1) EOLS Query (N)

The EOLS Query Charge will apply each time a customer requests information for a line number and the SCP sends a response. (N)  
(N)

(2) Originating Point Code Establishment or Change Charge (N)

The Originating Point Code Establishment or Change Charge provides for the establishment or change of a customer requested Originating Point Code. This charge is nonrecurring and will apply each time that the customer requests and receives the establishment of a new Originating Point Code or requests and receives a change to an existing Originating Point Code. These codes are to be used for billing EOLS Queries. (N)  
(N)  
(N)  
(N)  
(N)  
(N)

(F) Rates and Charges (N)

	<u>Rate</u>	<u>USOC</u>	(N)
(1) EOLS Query - per EOLS Query	\$0.042825	N/A	(N)

(2) Originating Point Code Established or Changed - per Establishment or Change	\$51.00	EOLPC	(N) (N) (N)
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