

**BELLSOUTH**

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Ben G. Almond  
Executive Director-  
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August 27, 1997

RECEIVED

AUG 29 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20544

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

DOCKET FILED

RE: Confidential treatment of Universal Service Worksheets for BellSouth  
Cellular Corp (CC Dockets 97-12, 96-45, DA Number 97-1671A).

Dear Mr. Caton:

On August 27, 1997, BellSouth Cellular Corporation forwarded its Universal Service Worksheets (September 1, 1997 Worksheets) to the Universal Service Administration in Whippany, New Jersey.

Attached is a copy of the cover sheet that accompanied the Worksheets. BellSouth Cellular Corporation and its parent company BellSouth Corporation request confidential treatment by the FCC of the revenue information provided on the Worksheets as detailed in the second paragraph, second page of the cover sheet.

Please associate this notification and request with the referenced proceedings.

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

Sincerely,



Ben G. Almond  
Executive Director

Attachment

cc: Regina Keeney  
Daniel Phythyon  
James Lande

No. of Copies rec'd  
List ABCDE

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**BELLSOUTH  
CELLULAR CORP.**

Room 810  
1100 Peachtree Street, N.E.  
Atlanta, Georgia 30309-4599

August 27, 1997

USAC  
Universal Service Administration  
100 South Jefferson Rd.  
Whippany, NJ 07981

Re: September 1, 1997 Universal Service Worksheet

Gentlemen:

Enclosed are Universal Service Worksheets for BellSouth Cellular Corp. wholly-owned subsidiaries and managed or majority-owned affiliates ("BSCC") engaged in the provision of interstate telecommunications service. Attachment I lists each legal entity included in the worksheet calculations. Three additional BSCC affiliations - Los Angeles Cellular Telephone Company, Houston Cellular Telephone Company, and Galveston Cellular Telephone Company - are filing separate worksheets on their own behalf. Subsidiary and affiliate information and revenue data is provided for the period between January 1, 1997, and June 30, 1997.

BSCC does not have the capability, in its internal data reporting systems, to determine the percentage of its airtime, monthly fees or long-distance revenues associated with interstate or international calls. Therefore, as provided for in the Universal Service Worksheet instructions ("Contributors who cannot calculate a percentage by using information from their books of accounts and other internal data reporting systems may elect to rely on a special study to estimate percentages") BSCC has relied on two special studies to complete its Worksheet.

First, BSCC has opted to use a factor of 1 percent in column b, lines 28, 39, and 40. This is the percent of total cellular and other radiotelephone revenue attributable to long-distance service, rounded to the nearest percent, as derived from Table 6 of the Annual Survey of Communications Services: 1995, U. S. Department of Commerce, Economics and Statistics Administration, Bureau of the Census. Second, because BSCC does not have the ability to separate its interstate and international long-distance revenues from other long-distance revenues, i.e., intrastate toll, an internal study was undertaken to determine a percentage of 65% to be used in column b, lines 30 and 44. This percentage is based on the ratio of interstate and international minutes to total toll minutes billed to BSCC from its long-distance carrier for the period from January 1997 through June 1997.

In addition, BSCC does not have the capability, in its internal reporting systems, to derive line-by-line breakdowns of individual legal entities' gross revenues. BSCC has therefore manually derived the line-by-line revenues on a consolidated basis.

Pursuant to Section 0.459 of the Commission's rules (47 C.F.R. Sec. 0.459), BSCC requests that the information on lines 22 through 50 contained in the attached FCC Form 457 be withheld from public inspection. This revenue information is highly confidential and proprietary in nature. Disclosure of this commercial information would cause substantial harm to the competitive position of the affected BSCC subsidiaries. Further, the Commission noted in its Public Notice, released August 11, 1997 (CC Docket 97-21, 96-45, DA Number: 97-1671A), entitled "FCC Announces Non-Substantive Changes to Universal Service Worksheet Instructions Released on August 4, 1997" (Page 2, IV. "Reminders") that regulated entities may request such confidential treatment. Thus, given the confidential and proprietary nature of this data and the Commission's provision that such data may be kept confidential, BSCC respectfully requests that the Commission withhold all such data from public inspection.

Please direct any inquiries to Linda H. Lancaster at the above address or by telephone at (404)249-6710.

Sincerely,

A handwritten signature in cursive script that reads "Linda H. Lancaster".

Linda H. Lancaster  
Director-Regulatory Strategy

Enclosure