

BELLSOUTH

W. W. (Whit) Jordan
Vice President-Federal Regulatory

February 10, 1998

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Ex Parte

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FEB 10 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: Pay Telephone Reclassification and Compensation Provisions of
Telecommunications Act of 1996, CC Docket No. 96-128

Dear Ms. Salas:

Please enter into the record of the above referenced docket the attached letter to Ms. Rose M. Crellin of the Enforcement Division of the Common Carrier Bureau. The attached letter concerns the provision of payphone specific coding digits via Flex-ANI.

In accordance with 47 CFR 1.1206(a)(1) of the Commission's rules, the original of this letter and one copy are being filed with your office. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

Please direct any inquiries concerning the foregoing to the undersigned.

Sincerely,



W. W. Jordan
Vice President - Federal Regulatory

Attachment

cc: Rose M. Crellin

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February 10, 1998

Ms. Rose M. Crellin
Federal Communications Commission
Common Carrier Bureau
1919 M Street, NW
Washington, DC 20554

RE: Pay Telephone Reclassification and Compensation Provisions of
Telecommunications Act of 1996, CC Docket No. 96-128, Ex Parte

Dear Rose:

Michael Kellogg's February 5, 1998, letter on behalf of the LEC ANI Coalition, provided an updated estimate of what percentage of payphone lines will be capable of passing payphone specific digits on March 9, 1998. The letter also outlined that the LEC Coalition estimates were based on the timely delivery of software upgrades from switch vendors. This letter provides further information for BellSouth Telecommunications, Inc. (BellSouth).

As of March 9, 1998, 100% of BellSouth's payphone service provider (PSP) lines will be capable of passing payphone-specific coding digits, following the successful implementation of a software patch for Siemens EWSD switches which was delivered to BellSouth on February 3, 1998. The patch has tested out correctly, and BellSouth is in process of implementing the patch expeditiously in its 30 EWSD switches and barring any unforeseen problems will meet March 9, 1998. This patch resolves a problem of incorrect Flex-ANI from smartsets/dumblines in those instances where the IXC does not order Flex-ANI on its trunk groups

The above paragraph addresses the status of the lines in BellSouth. There are two additional issues concerning call types over these PSP lines that the Commission needs to be aware of. The first and by far the most important of the two is a problem with the Nortel DMS family of switches not currently sending payphone-specific coding digits on the 800/Toll Free call type from smartsets/dumblines connected to these switches. BellSouth discovered this problem during its testing and implementation of Flex-ANI and submitted a request to Nortel on December 9, 1997, for a software patch to correct the problem for the DMS100/200 and is currently working with Nortel for a solution for the DMS 10. BellSouth escalated the request within Nortel in order to emphasize the need for an expeditious delivery. A firm commitment date of February 25, 1998, has been made by Nortel for the delivery of a software patch for the first of 4 different generic versions of the DMS 100/200 family of switches. BellSouth is currently negotiating firm

dates for the other 3 generic versions of the DMS 100/200 family and the DMS 10. Within 2-3 weeks after receiving and verifying that the patches work to BellSouth's satisfaction, BellSouth will complete the necessary work to send payphone-specific coding digits for the 800/Toll-Free call type from its Nortel DMS switches (approximately 340 switches). Starting with the February 25th delivery date for the first patch and adding a worst case of 3 weeks of BellSouth work, places BellSouth at March 18th as the estimated worst case date that the Nortel DMS family of switches will begin to send payphone-specific coding digits for 800/Toll Free calls that originate from smartsets/dumblines. Based on estimated delivery dates for the other DMS 100/200 patches, BellSouth's compliance for this call type could very well be extended to mid-to-late April 1998. As of yet, BellSouth does not have firm delivery dates on all the generics from Nortel and cannot commit until we receive such dates. BellSouth estimates that this problem with DMS switches could affect as high as 10% of the payphone calls. This estimate is based on approximately 40% of BellSouth's switches being DMSs and approximately 25% of payphone traffic being dial around access code or subscriber 800/Toll Free traffic.¹ Because of the uncertainty with regard to final delivery dates by Nortel, BellSouth requests a 45 day extension of the waiver which would be used only if Nortel is delayed in providing the switch patches and only to the extent necessary for BellSouth to implement the patches in accordance with the timeframe outlined above.

The second call type problem is associated with 800/Toll Free calls to IXCs where the IXC has arranged for BellSouth's 800/Toll Free database to translate the 800/Toll Free telephone number into its actual "plain old telephone service" (POTS) routing number and to send this POTS number to the IXC. Whenever one of these calls is made, the switch performing the 800/Toll Free database query sends an ANI ii of 24 to notify the IXC that this call was originally dialed as an 800/Toll Free call regardless of what ANI ii code was originally assigned to the call before the 800/Toll Free database query. The use of ANI ii 24 in this case is an industry standard for all switch types. This is the same issue as detailed in SBC's letter to you, dated January 23, 1998, as Item 3 a) in their "problem" chart on page 2 and further discussed on pages 7-10. Based on fourth quarter 1997 data, only .0002% of the total 800/Toll Free calls routed to IXCs carried the ANI ii 24. Using estimates of 33% of all 800/Toll Free calls originate from payphones and are compensatable, and further, 25% of payphone traffic is estimated to be dial around access code or subscriber 800/Toll Free traffic,² further reduces this percentage to an estimated .000017% of all payphone calls. Stated another way, at \$.30 per-call, the estimated annual compensation for these calls is approximately \$1750. This results in such a small number of compensatable calls to IXCs that will not have payphone specific coding digits as to constitute compliance on BellSouth's part, or in the alternative, BellSouth requests the same waiver that SBC has requested on this issue, since this is an industry problem.

¹ See Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Second Report and Order, released October 9, 1997, n. 127.

² Id.

BellSouth will keep you informed of the status of these issues and any other issues that may be discovered in our implementation of Flex-ANI.

If you have questions, do not hesitate to call me at (202)463-4112.

Sincerely,



Ben G. Almond
Executive Director - Federal Regulatory