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202 463-4113
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March 7, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

MAR 07 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Written Ex Parte in CC Docket No. 80-286

Dear Ms. Salas:

This is to inform you that BellSouth made the attached written ex parte to Sharon Webber, Deputy Chief of the Common Carrier Bureau's Accounting Policy Division. Copies of that ex parte were also sent to: Robert Loube and Will Cox of the Accounting Policy Division; Joel Shifman of the Maine Public Utilities Commission; Peter Bluhm of the Vermont Public Service Commission; and Sandra Ibaugh of the Indiana Utility Regulatory.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this notice and that written ex parte presentation in the docket identified above. Please associate this notification with the record in that proceeding. Thank you.

Sincerely,

Kathleen B Levitz

Kathleen B. Levitz

Attachment

cc: Sharon Webber (w/o attachment)
Robert Loube (w/o attachment)
Will Cox (w/o attachment)
Joel Shifman (w/o attachment)
Peter Bluhm (w/o attachment)
Sandra Ibaugh (w/o attachment)

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March 7, 2000

WRITTEN EX PARTE

Ms. Sharon Webber
Accounting Policy Division
Common Carrier Bureau
Room 5-B552
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

Re: CC Docket No. 80-286

Dear Ms Webber:

On December 15, 1999 representatives of BellSouth met with you and members of federal and state members of the 80-286 Joint Board staff to present our analysis of the impact upon the separations process of treating Internet traffic as intrastate traffic. During that meeting staff members asked us the following questions for which we committed to determine the correct answers:

1. How does BellSouth classify minutes attributable to Extended Area Service ("EAS") and optional calling plans, particularly those for which we have flat rates? Does BellSouth distinguish between local and intrastate toll minutes? (These questions related specifically to such plans in Kentucky and Tennessee.)
2. Is BellSouth measuring all minutes or are there categories of traffic (*e.g.*, FG A) for which it uses Percentage of Interstate ("PIU") estimates?
3. Does BellSouth use holding times in developing traffic volumes (*i.e.*, the matrix method)?

Attached are answers to those questions prepared by BellSouth's subject matter experts. I hope you and the other Joint Board staff members who attended that earlier meeting find these answers useful.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in the docket identified above.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachment

cc: Sharon Webbe
Robert Loube
Will Cox
Joel Shifman
Peter Bluhm
Sandra Ibaugh

Additional information requested by 80-286 joint board staff

1. How does BellSouth classify minutes attributable to EAS and optional calling plans, particularly those for which it has flat rates? Does BellSouth distinguish between local and intrastate toll minutes? (This question relates specifically to those plans in Kentucky and Tennessee.)

EAS minutes are classified as local. Depending on the specific optional calling plan, the minutes may be classified as local or as intrastate toll. BellSouth is able to distinguish and separately categorize local minutes versus intrastate toll minutes.

2. Is BellSouth measuring all minutes or are there categories of traffic (*e.g.*, FG A) for which it uses Percent Interstate Usage (PIU) estimates?

All minutes are measured for toll and access type services and in most cases the jurisdiction of the related minutes can be determined from the Automatic Message Accounting (AMA) record. A PIU factor (supplied by the Interexchange Carrier), however, is applied to the total minutes of use data to determine the jurisdiction (interstate versus intrastate) for FGA and FGB access minutes.

3. Does BellSouth use holding times in developing traffic volumes (*i.e.*, the matrix method)?

Yes, average local holding times are used in the development of local traffic volumes for those few offices (less than 5% of all end offices) that have not been converted to local AMA. The local holding time is a composite of the local holding times for those offices within a state that have been converted to local AMA. The average local holding time for the state is multiplied by local message counts to develop local minute volumes for the affected offices only.