

ORIGINAL

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John M. Goodman
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EX PARTE OR LATE FILED



Ex Parte

March 8, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communication Commission
445 12th Street, SW
Washington, D.C. 20554

RECEIVED

MAR 08 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WT Docket No. 97-207: Calling Party Pays Service Option in the Commercial Mobile Radio Service

Dear Ms. Salas:

The attached letter is being submitted today to Mr. James Schlichting of the Wireless Telecommunications Bureau.

Please enter this letter into the record as appropriate. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John M. Goodman".

cc: J. Schlichting
J. Sievert
D. Siehl

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John M. Goodman
General Attorney



Ex parte

March 8, 2000

Mr. James D. Schlichting
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Schlichting:

Re: WT Docket No. 97-207

The Wireless Bureau staff has asked whether a telecommunications service provider must buy switched access services in order to be able to buy BNA from Bell Atlantic's interstate tariffs. The answer is that there is no such requirement in our tariffs.

Moreover, the Commission's orders would not seem to permit such a requirement. The Commission "require[d] the local exchange carriers (LECs) to provide to interstate common carriers non-discriminatory access to the billing name and address (BNA) of LEC subscribers" in order to "enable interstate service providers to seek payment for their services directly from the LEC customer."¹ Thus, for example, the rules permit a regional carrier to get BNA to bill a Maryland Bell Atlantic customer for a call charged in California, where the regional carrier does not do business at all in Bell Atlantic territory. Tying BNA to use of switched access would seem to be inconsistent with this purpose.

Yours truly,

A handwritten signature in black ink that reads 'John M. Goodman'.

John M. Goodman

Copy for Janet L. Sievert
David Siehl

¹ *Policies and Rules Concerning Local Exchange Carrier Validation and Billing Information for Joint Use Calling Cards*, 8 FCC Rcd. 4478 ¶ 1 (1993).