

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
1998 Biennial Regulatory Review –)	CC Docket No. 98-171
Streamlined Contributor Reporting)	
Requirements Associated with Administration)	
of Telecommunications Relay Service, North)	
American Numbering Plan, Local Number)	
Portability, and Universal Service Support)	
Mechanisms)	
)	
Telecommunications Services for Individuals)	CC Docket No. 90-571
with Hearing and Speech Disabilities, and the)	
Americans with Disabilities Act of 1990)	
)	
Administration of the North American)	CC Docket No. 92-237
Numbering Plan and North American)	NSD File No. L-00-72
Numbering Plan Cost Recovery Contribution)	
Factor and Fund Size)	
)	
Number Resource Optimization)	CC Docket No. 99-200
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Truth-in-Billing Format)	CC Docket No. 98-170

REPLY COMMENTS

BellSouth Corporation, on behalf of itself and its wholly owned subsidiaries (“BellSouth”), hereby submits its Reply Comments on the *Further Notice of Proposed Rulemaking* (“Notice”) in the above referenced proceeding.¹

¹ *In the Matter of Federal-State Joint Board on Universal Service et. al.*, CC Docket No. 96-45, *Further Notice of Proposed Rulemaking and Report and Order*, FCC 02-43 (rel. Feb. 26, 2002) (“*Further Notice*”).

I. INTRODUCTION

1. In its comments, BellSouth proposed a connections-based approach to universal service contributions that would meet the statutory requirements that the Commission is mandated to fulfill.² Ultimately, the comments in this proceeding distill to the single issue—what is and is not permissible under the statute.

2. Without question, the Commission has the authority to establish rules that will require providers of telecommunications to contribute to the federal fund established for the purpose of preserving universal service. While the Commission has discretion, it, nevertheless, is not unlimited. Its determination must be rational and well reasoned and shown to fit within the framework of the statute.

3. Thus, the criteria upon which any contribution mechanism must be evaluated are the requirements of the Communications Act. The Act provides that “[e]very telecommunications carrier that provides interstate telecommunications services shall contribute”³ to the universal service fund. The operative term is “shall.” It is mandatory, not permissive. The sole exception to the statute’s command is that the Commission may (not must) exempt a carrier or class of carriers from contributing to the fund if “the carrier’s telecommunications activities are limited to such an extent that the level of such carrier’s contribution to the preservation and advancement of universal service would be de minimis.”⁴ In addition to this limited and narrowly circumscribed exemption authority, the Commission may require “[a]ny other provider of

² BellSouth and SBC developed the connections-based approach jointly.

³ 47 U.S.C. § 254(d).

⁴ *Id.*

interstate telecommunications” to contribute to the universal service fund if the public interest requires.⁵

4. The statute requires that the contribution mechanism result in contributions that are equitable and nondiscriminatory. The Commission has also sought to insure that the contribution mechanism is competitively neutral. Thus, the statute does not predetermine the contribution mechanism but rather establishes the measure of an appropriate mechanism.

5. It is within the context of this statutory framework that the comments in this proceeding must be considered. As discussed further below, many suggestions such as requests for exemption or attempts to freeze relative contribution levels fall outside the statute’s framework and thus, simply will not work.

II. DISCUSSION

6. Several groups urge that the Commission establish *a priori* exemptions for a variety of carriers to contributing to universal service fund. Thus, for example, the Allied Personal Communications Industry Association of California (“Allied”) claims that no increase in contributions made by paging carriers is justified. Arguing that the existing “safe harbor” percentages should represent a cap to paging carriers contributions, Allied also argues that the Commission maintain existing *de minimis* exemptions.⁶ In a similar vein, American Public Communications Council wants payphone service providers to be exempted from contributing to the fund.⁷

7. To fulfill its obligations under the statute, the Commission cannot exempt carriers from contributing to the fund before it has specified the contribution mechanism. The statute

⁵ *Id.*

⁶ *See, e.g.*, Allied at 3-6. *See also* Comments of American Association of Paging Carriers.

⁷ *See* Comments of American Public Communications Council at 16-18.

permits the Commission to exempt carriers from contributing to the fund but only upon a determination that the “level of the carrier’s contribution to the preservation and advancement of universal service would be *de minimus*.”⁸ The Commission cannot possibly make the requisite determination prior to settling on the specifics of the contribution mechanism.

8. Implicit in some of the comments is that the Commission should continue to rely on a revenue measure for the purpose of determining *de minimis* exemptions. There are two fundamental flaws to such arguments. In the first instance, the Commission has identified several imperfections not the least of which is the imprecision in which interstate usage and revenues are identified by non-wireline carriers. The safe-harbor percentages were not strictly scrutinized when adopted and have not been reevaluated. Given the market changes that the Commission identified in its *Notice*, these percentages can hardly form the basis of future exemptions to contributing to the universal service fund.

9. The second flaw of the argument lies in its conflict with the statutory basis for exemptions. The *de minimis* exemption is tied to the level of contribution. In this proceeding, the Commission is considering revamping the contribution mechanism and moving from a revenue-based mechanism to a connections-based mechanism. It is only after such a mechanism is adopted, can the Commission determine whether a carrier’s level of contribution is *de minimis* and that an exemption would not undermine the stability and predictability of the universal service fund.⁹

10. Some commenters oppose a connections-based contribution mechanism. For example, Arch Wireless argues that such a system would be arbitrary and capricious, in part,

⁸ 47 U.S.C. § 254(d).

⁹ Even if the Commission were to retain a revenue based fund, the Commission cannot address *de minimis* exemptions until it determines how to address the under reporting of interstate revenues by some carrier groups.

because the Commission has previously declined to adopt a non-revenue-based contribution mechanism. To do so now, Arch complains, would be inconsistent with past determinations and result in a contribution mechanism that is not equitable, nondiscriminatory or competitively neutral.¹⁰ These arguments are wrong.

11. The *Notice* identified numerous marketplace changes that have made reliance on interstate revenues as a contribution mechanism problematic. The ever-increasing inability to identify and attribute revenues to interstate services is a source of instability to the universal service fund which calls into question whether a revenue-based mechanism can form the foundation of a predictable fund as required by the statute.

12. None of the commenters, such as GSA or Consumers Union, that advocates that the Commission retain a revenue-based mechanism addresses the Commission's concerns. No commenter has offered a comprehensive revenue-based proposal that addresses each of the issues in the *Notice*. Instead, all that supporters of a revenue approach suggest are cosmetic changes. For example, the United States Cellular Corporation suggests that the safe-harbor percentages be eliminated.¹¹ Eliminating safe harbor percentages does nothing to address the problems of bundling and the difficulty of accurately attributing revenues to interstate services.

13. The objections to a connections-based approach fall into two different groupings. The first group is comprised mostly of wireless carriers who perceive any modification of the existing revenue-based approach results in wireless carriers bearing an increased responsibility for contributing to the universal service fund. There is nothing inherently wrong with such a result. The market evidence is that wireless carriers' interstate activities are on the rise. In view

¹⁰ Arch Wireless at 2-9. *See also* Comments of California Public Utilities Commission and the People of the State of California; Comments of OnStar Corporation; Comments of TracFone Wireless, Inc.

¹¹ United States Cellular Corporation at 9-11.

of the indisputable marketplace changes, preserving the existing contribution responsibility of wireless carriers would be inequitable, discriminatory and would conflict with the principals of competitive neutrality.

14. The other group of objections to a connections-based approach is specific to the proposals made by the Coalition for Sustainable Universal Service and Sprint. As BellSouth pointed out in its comments, both of these proposals fail to meet statutory muster. The Coalition proposal was specifically designed to relieve interexchange carriers from any responsibility for contributing to the universal service fund. It is this feature that many commenters find objectionable. Indeed, a contribution mechanism that exempts a class of carriers who have substantial interstate activities is absurd on its face and inconsistent with the statute.

15. The Coalition attempts to defend its proposal by claiming that interexchange carriers fall within the *de minimus* exemption of Section 254(d). The Coalition portrays interexchange carriers as not providing end user connections.¹² Such a position is a contrivance of convenience. As BellSouth pointed out in its comments, every telecommunications provider that sells service to an end user provides that end user with a connection to its service.¹³ The Coalition proposal defines away an interexchange carrier's contribution responsibility – but only the interexchange carrier's responsibility. The Coalition's definition of connections as occurring at the end user premises instead of viewing the definition of a connection as the connection provided to the end user to the providers' networks cleverly allows the Coalition to claim that interexchange carriers do not have to contribute to the universal service fund.

¹² Coalition at 88-89.

¹³ For example, even if an end user provided its own facility all the way to an interexchange carrier's point of presence, at that point, for the end user to access the interexchange carrier's network, the carrier would have to provide the end user with a connection.

16. Contrary to the Coalition's belief, it cannot define away a carrier's obligation to contribute to the universal service fund. Despite the Coalition's twisted reading of the statute, the Coalition's biased definition of connection would not pass the statutory requirement that the contribution mechanism be equitable and nondiscriminatory. Nor can the Coalition justify excluding interexchange carriers from contributing to the universal service fund. The only authority that the Commission has to exempt a carrier from contributing to the universal service fund is if the carrier's activities are limited to such an extent that its contributions to the universal service fund would be *de minimus*. Claiming that interexchange carriers activities are limited, as the Coalition expects the Commission to do, turns the *de minimus* exception on its head.

17. The Coalition's less than subtle exclusion of interexchange carrier's from contributing to the universal service fund calls the Coalition proposal into question. But, the infirmities of the Coalition proposal are specific to it, not to the concept of a connections-based proposal. Indeed, the connections-based approach recommended by BellSouth and SBC does not have the bias reflected in the Coalition proposal.

18. The other connection-based proposal discussed in the *Notice*, the Sprint proposal, was also criticized by the commenters. Like the Coalition proposal, it is designed to protect the interests of one class of carriers, wireless, over all other providers of interstate telecommunications. And, like the Coalition proposal, the Sprint proposal cannot meet statutory requirements. Indeed, maintaining wireless's current contribution levels has no factual justification. As a result, Sprint's proposal is tainted.

19. Of course, as BellSouth's and SBC's joint proposal shows, a fair, equitable and nondiscriminatory connections-based contribution mechanism can be defined. Not only does the proposal address the concerns identified in the *Notice*, it creates stability because it expands the

contribution base beyond just telecommunications carriers to interstate telecommunications providers, specifically Internet service providers (“ISPs”). While some commenters argue that ISPs should continue to be excluded from contributing to the universal service fund,¹⁴ continuation of this exclusion would be contrary to the Commission’s goals. Including ISPs within the group of interstate telecommunications providers that are designated contributors to the fund ensures that the contribution mechanism is free from manipulation and avoidance. Providers will not be able to gain a market advantage by avoiding the cost of contributing to the universal service fund simply by changing their designations from carrier to ISP. Having all providers of interstate telecommunications contribute to the universal service fund will bring the stability to the universal service fund that the Commission seeks.

III. CONCLUSION

20. None of the comments offer a revenue-based mechanism that addresses the concerns expressed by the Commission in the *Notice*. Other than cosmetic changes, supporters of the revenue-based approach would leave the existing mechanism in tact. Based on the record developed thus far, such an outcome cannot be justified.

21. Much of the opposition to a connections-based contribution mechanism is related to the proposals made by the Coalition and Sprint. BellSouth concurs that neither the Sprint nor Coalition proposal provides a valid connections-based approach. Nevertheless, a fair and

¹⁴ See AOL Time Warner at 7-8; Sprint at 10; Information Technology Association of America at 12-14.

equitable connections-based approach can be defined. BellSouth and SBC, jointly, have submitted such an approach for the Commission's consideration.

Respectfully submitted,

BELLSOUTH CORPORATION

By: /s/ Richard M. Sbaratta
Richard M. Sbaratta

Its Attorney

Suite 4300
675 West Peachtree Street, N. E.
Atlanta, Georgia 30375-0001
(404) 335-0738

Date: May 13, 2002

CERTIFICATE OF SERVICE

I do hereby certify that I have this 13th day of May 2002 served the following parties to this action with a copy of the foregoing **REPLY COMMENTS** by electronic filing and/or by placing a copy of the same in the United States Mail, addressed to the parties listed on the attached service list.

/s/ Juanita H. Lee
Juanita H. Lee

BellSouth Reply Comments
CC Docket No. 96-45 et al.
May 13, 2002

Service List CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170

Charles C. Hunter
Catherine M. Hannan
Association of Communications
Enterprises
Hunter Communications Law Group
1424 Sixteenth Street, N. W., Suite 105
Washington, D. C. 20036

Doug Kitch
Beacon Telecommunications
Advisors, LLC
2110 Vickers Drive, Suite 2106
Colorado Springs, CO 80918

Jonathan Jacob Nadler
Angela Simpson
Information Technology
Association of America
Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Avenue, N.W., Box 407
Washington, D. C. 20044

Kenneth E. Hardman
American Association of
Paging Carriers
MOIR & HARDMAN
1015 18th Street, N. W., Suite 800
Washington, D. C. 20036-5204

Susan M. Gately
Annie M. DePree
Economics and Technology, Inc.
Economics Consultant
AD Hoc Telecommunications
User Committee
Suite 400
Two Center Plaza
Boston, MA 02108

James S. Blaszak
Stephen J. Rosen
The Ad Hoc Telecommunications
User Committee
Levin, Blaszak, Block &
Boothby, LLP
2001 L Street, N. W., Suite 900
Washington, D. C. 20036

David M. Wilson
Leon M. Bloomfield
Wilson & Bloomfield LLP
Allied Personal Communications
Industry Association of California
1901 Harrison Street, Suite 1630
Oakland, CA 94612

Elizabeth R. Sachs, Esq.
Pamela Gaary
American Mobile
Telecommunications Association, Inc.
Lukas, Nace, Gutierrez & Sachs
1111 19th Street, N. W. Suite 1200
Washington, D. C. 20036

Steven N. Teplitz
Vice President and Associate
General Counsel
AOL Time Warner Inc.
800 Connecticut Avenue, N. W., Suite 200
Washington, D. C. 20006

Donna N. Lampert
Mark J. O'Connor
AOL Time Warner, Inc.
Lampert & O'Connor, P.C.
1750 K Street, N. W.
Suite 600
Washington, D. C. 20006

Albert H. Kramer
Allan C. Hubbard
Jeffrey H. Tignor
American Public Communications
Council
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L Street, N. W.
Washington, D. C. 20037-1526

James Rowe
Executive Director
Alaska Telephone Association
201 E. 56th, Suite 114
Anchorage, Alaska 99518

Mark C. Rosenblum
Judy Sello
AT&T Corporation
Room 1135L2
295 North Maple Avenue
Basking Ridge, New Jersey 07920

Howard J. Symons
Sara F. Leibman
Bryan T. Bookhard
AT&T Wireless Services, Inc.
Mintz, Levin, Cohn, Ferris,
Glovsky And Popeo, P. C.
701 Pennsylvania Avenue, N. W.
Suite 900
Washington, D. C. 20004

Douglas I. Brandon
Vice President-External Affairs
AT&T Wireless Services, Inc.
1150 Connecticut Avenue, N. E.
Washington, D. C. 20036

A. Sheba Chacko
Kristen Neller Verderame
BT North America Inc.
11911 Freedom Drive, 11th Floor
Reston, VA 20190

Joel S. Winnik
David L. Sieradzki
Ronnie London
BT North America Inc.
Hogan & Hartson L.L.P.
555 Thirteenth Street, N. W.
Washington, D. C. 20004

Gary M. Cohen
Lionel B. Wilson
Stacie M. Castro
Public Utilities Commission
State of California
505 Van Ness Avenue
San Francisco, CA 94102

John T. Nakahata
Michael G. Grable
Coalition For Sustainable Universal
Service
Harris, Wiltshire & Grannis LLP
1200 Eighteenth Street, N. W.
Suite 1200
Washington, DC 20036

Carol Ann Bischoff
Jonathan Lee
Competitive Telecommunications
Association
1900 M Street, N. W.
Suite 800
Washington, D. C. 20036

Robert J. Aamoth
Competitive Telecommunications
Association
Kelley Drye & Warren LLP
1200 19th Street, N. W.
Suite 500
Washington, D. C. 20036

Harold Mordkofsky
Douglas W. Everette
Concerned Paging Carriers
Blooston, Mordkofsky, Dickens,
Duffy & Prendergast
2120 L. Street, N.W.
Suite 300
Washington, D. C. 20037

Christopher R. Day
Angela J. Campbell
CU et al.
Institute for Public Representation
Georgetown University Law Center
600 New Jersey Avenue, N.W.,
Suite 312
Washington, D. C.

Laurie Pappas
Deputy Public Counsel
Texas Office of Public
Utility Counsel
CU et al.
1701 N. Congress Avenue
Suite 9-180, P. O. Box 12397
Austin TX 78711-2397

Cheryl Lynn Schneider
ePHONE Telecom, Inc.
Telecom Legal Services
International, Inc.
1776 I Street, N. W, 9th Floor
Washington, D. C. 20006

George N. Barclay
Michael J. Ettner
General Service Administration
1800 F Street, N. E.
Room 4002
Washington, D. C. 20405

Snavelly King Majoros O'Connor
& Lee, Inc.
Economic Consultants
General Services Administration
1220 L Street, N. W., Suite 410
Washington, D. C. 20005

Keith Oliver
Home Telephone, Inc.
P. O. Box 1194
Moncks Corner, S. C. 29461

William F. Barrett, III
Manager of Regulatory Affairs
Bluffton Telephone Company, Inc.
Hargray Telephone Company, Inc.
856 William Hilton Parkway
P. O. Box 5519
Hilton Head, S. C. 29938

Hannah A. Lancaster
President
Chesne Telephone Company
208 South Alabama Avenue
P. O. Box 430
Chesnee, SC 29323

James F. Hicklin
Vice President & General Manager
Chester Telephone Company
Lockhart Telephone Company, Inc.
Ridgeway Telephone Company, Inc.
112 York Street
P. O. Box 160
Chester, S. C. 29706

Ronald K. Nesmith
Controller
Farmers Telephone Cooperative, Inc.
P. O. Box 588
Kingstree, S. C. 29556

H. J. Dandridge, III
General Manager
Palmetto Rural Telephone Cooperative
2471 Jeffries Highway
P. O. Box Drawer 1577
Walterboro, S. C. 29488

Ben Spearman
Chief Regulatory Officer
PBT Telecom, Inc.
1660 Juniper Spring Road
Gilbert, S. C. 29054

James P. Wilder
Chief Executive Officer
Piedmont Rural Telephone
Cooperative, Inc.
201 Anderson Drive
P. O. Box 249
Laurens, S. C. 29360

Irvin B. Williams
General Manager
Sandhill Telephone Cooperative, Inc.
122 South Main Street
P. O. Box 519
Jefferson, S. C. 29718

Alan W. Pedersen
VP-Regulatory Affairs
Sandwich Isles Communications, Inc.
Pauahi Tower, Suite 2750
Honolulu, HI 96813

Paula Eller
Corporate Secretary
Yukon Telephone Company, Inc.
P. O. Box 873809
Wasilla, Alaska 99687

David C. Bergmann
Assistant Consumer' Counsel
Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485

Michael J. Travieso
Chair, NASUCA Telecommunications
Committee
8300 Colesville Road, Suite 101
Silver Spring, MD 20910

BellSouth Reply Comments
CC Docket No. 96-45 et al.
May 13, 2002

Richard A. Askoff
Martha West
National Exchange Carrier
Association, Inc.
80 South Jefferson Road
Whippany, New Jersey 07981

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
James B. Goldstein
NEXTEL Communications, Inc.
2001 Edmund Halley Drive
Reston, VA 20191

Laura H. Phillips
Laura S. Gallagher
NEXTEL Communications, Inc.
Drinker Biddle & Reath LLP
1500 K Street, N. W., Suite 1100
Washington, D. C. 20005

Margot Smiley Humphrey
National Rural Telecom Association
Holland & Knight
2100 Pennsylvania Avenue, N. W.
Suite 400
Washington, D. C. 20006

Stuart E. Polikoff
Organization for the Promotion
And Advancement of Small
Telecommunications Companies
21 Dupont Circle NW
Suite 700
Washington, D. C. 20036

L. Marie Guillory
Daniel Mitchell
National Telecommunications
Cooperative Association
4121 Wilson Boulevard, 10th Floor
Arlington, VA 22203

Kenneth D. Enborg
William L. Ball
OnStar Corporation
1400 Stephenson Highway
Troy, MI 48083

Eric J. Branfman
Harry N. Malone
PacTec Communications, Inc.
Swidler Berlin Shereff Friedmann, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007-5116

Sylvia Lesse
John Kuykendall
Rural Cellular Association
Kraskin, Lesse & Cosson, LLP
2120 L Street, N. W.
Suite 520
Washington, D. C. 20037

David Cosson
Rural Independent Competitive Alliance
Kraskin, Lesse & Cosson, LLP
2120 L. Street, N. W., Suite 520
Washington, D. C. 20037

Jeffrey A. Brueggeman
Gary L. Phillips
Paul K. Mancini
SBC Communications, Inc.
1401 Eye Street, NW, Suite 1100
Washington, D. C 20005

Marybeth Banks
H. Richard Juhnke
Jay C. Keithley
Sprint Corporation
401 9th Street, N.W., #400
Washington, D. C. 20004

Roger B. Borgelt
Consumer Protection Division
Public Agency Representation Section
P. O. Box 12548
Austin, Texas 78711-2548

Thomas Jones
David M. Don
Stephanine Poday
Time Warner Telecom XO
Communications and Allegiance Telecom
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D. C. 20036

Mitchell F. Brecher
Nancy E. Booker
TracFone Wireless, Inc.
Greenberg Traurig, LLP
800 Connecticut Avenue, N. W.
Suite 500
Washington, D. C. 20006

Peter M. Connolly
United States Cellular Corporation
Holland & Knight LLP
2099 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

Ann H. Rakestraw
Verizon telephone companies
1515 North Courthouse Road
Suite 500
Arlington, Virginia 22201

Peter Lurie
Vice President and General Counsel
Virgin Mobile USA, LLC
22 Foruth Street, 8th Floor
San Francisco, CA 94103

Helen E. Disenhaus
Douglas D. Orvis II
Virgin Mobile USA, LLC
Swidler Berlin Shereff Friedman, LLP
30000 K Street, N. W., Suite 300
Washington, D. C. 20007

Brian T. O'Connor
Robert Calaff
VoiceStream Wireless Corporation
401 9th Street, N. W.
Suite 550
Washington, D. C. 20004

Gene DeJordy
Suzie Rao
Western Wireless Corporation
3650 131st Avenue, SE #400
Bellevue, Washington 98006

Lawrence W. Katz
Micronesian Telephone Company
Suite 500
1515 North Court House Road
Arlington, Virginia 22202-2909

Robert A. Underwood
Congress of the United States
House of Representatives
Washington, D. C. 20525-5301

Lawrence E. Sargeant
United States Telecom Association
1401 H Street, N. W., Suite 600
Washington, D. C. 20005

BellSouth Reply Comments
CC Docket No. 96-45 et al.
May 13, 2002

Lori Wright
WORLDCOM, Inc.
1133 19th Street, N. W.
Washington, D. C. 20036

Allan T. Thoms
Diane Munns
Partner Communications Cooperative
101 East Church Street
P. O. Box 8
Gilma, Iowa 50106-0008

James L. Daubendiek
Jefferson Telephone Company
105 W. Harrison Street
P. O. Box 269
Jefferson, IA 50129

William K. Keane
UNICOM, Inc.
Arter & Hadden LLP
1801 K Street, N. W.
Suite 400K
Washington, D. C. 20554

+Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals, 445 12th Street, S. W.
Room 5-B540
Washington, D. C. 20554

+Qualex International
The Portals, 445 12th Street, S. E.
Room CY-B402
Washington, D. C. 20554

Sheryl Todd
Accounting Policy Division
Federal Communications Commission
The Portals, 445 12th Street, S. E.
Washington, D. C. 20554

+ VIA ELECTRONIC FILING

BellSouth Reply Comments
CC Docket No. 96-45 et al.
May 13, 2002