
BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Customer Letter / Announcement
SN91081365**

Date: September 2, 1998

To: Providers of Long Distance Calling via Internet Protocol

Subject: Application of Access Charges

A number of companies are now offering long distance communications via the Internet or Internet protocol (IP) technology. Long distance communications completed in this manner do not have the characteristics of "information services." Instead, they have the characteristics of "telecommunications services." The appropriate service for BellSouth's provisioning of this capability to a company is access service, rather than local exchange service.

Effective with this memo, BellSouth will no longer provide local exchange service to companies providing long distance service via the Internet or IP technology. Companies providing this type of service should use one of BellSouth's access service offerings.

BellSouth's identification of these services as long distance telecommunications is fully consistent with the four criteria listed by the FCC in its April 10, 1998 report to Congress. Those criteria are as follows:

- (1) the service holds itself out as providing voice telephony or facsimile transmission service;
- (2) the service does not require the customer to use Customer Premises Equipment (CPE) different from that CPE necessary to place an ordinary touch-tone call (or facsimile transmission) over the public switched telephone network;
- (3) the service allows the customer to call telephone numbers assigned in accordance with the North American Numbering Plan, and associated international agreements; and
- (4) the service transmits customer information without net change in form or content.

Please contact your account team representative for more information.

Sincerely,

ORIGINAL SIGNED BY JERRY HENDRIX

Jerry Hendrix - Director
Interconnection Services