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October 12, 2005

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *BellSouth Corporation's Petition For Waiver of Tariffing and Price Cap Rules and Of Accounting Requirements*, WC Docket No. 05-277

Dear Ms. Dortch:

This letter supplements BellSouth Corporation's ("BellSouth") Petition for Waiver by providing further details concerning the process BellSouth would follow to ensure compliance with section 272(e) during the period the waiver would be in effect. As discussed in its petition, BellSouth is only seeking a waiver of certain aspects of the Commission's dominant carrier regulation pending completion of the *272 Sunset NPRM*,¹ which is likely to provide a broad resolution of regulatory treatment of long distance services provided by the Bell Operating Companies ("BOCs").

Section 272(e)(1) requires that a BOC fulfill any request for telephone exchange and exchange access service from an unaffiliated entity in a period no longer than the period in which it provides such services to itself or its affiliates. Section 272(e)(3) requires that a BOC charge its affiliates or impute the same amount for telephone exchange or exchange access service that is charged to unaffiliated interexchange carriers.

Currently, BellSouth Telecommunications, Inc. ("BST") provides access services to long distance carriers through the standardized ordering and billing process described below. BellSouth Long Distance, Inc. ("BSLD") obtains access services through this process in the same manner as other long distance providers. Upon the grant of BellSouth's waiver request, BSLD would continue to use these same standardized ordering and billing processes to order

¹ *Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements*, WC Docket No. 02-112, Notice of Proposed Rulemaking, 17 FCC Rcd 9916 (2002) ("*272 Sunset NPRM*").

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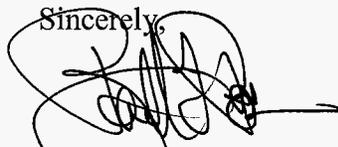
access services. To the extent BST provides long distance services after December 19, 2005, it too would use these standardized processes.

BellSouth's current access provisioning is based on the Access Service Request ("ASR") process. The ASR is based on an industry-wide set of guidelines – the Access Service Order Guidelines. Carriers may submit ASRs either manually through a BellSouth front-end system or electronically through a customer interface platform. Once submitted, ASRs go to BellSouth's main frame ordering system known as the Exchange Access Control and Tracking System ("EXACT"), which performs a number of edits and data validations. Successful orders continue to an invoicing system that automatically triggers the provisioning and billing processes. Billing records are processed through the Carrier Access Billing System ("CABS"). The rate tables contained in CABS are applied to all service orders including orders generated by BSLD for access services.

Upon grant of this waiver and as long as this waiver remains in effect, BellSouth will continue to use the ASR process to order access services and to generate billing records. Thus, to the extent a separate affiliate like BSLD orders access services, it will use the ASR process, as would BST should it order access services. This process has met the requirements of section 272(e)(1) over the last three years. BellSouth's orders will also generate CABS billing records, which will provide a basis for continued compliance with section 272(e)(3).

The grant of this waiver request will not affect BellSouth's continued compliance with section 272(e) as BellSouth will continue to use the same proven processes that have met such requirements in the past.

Please include a copy of this letter in the record in the above-referenced proceedings. Thank you for your attention to this matter.

Sincerely,

Bennett L. Ross

BLR:kjw

#605787

cc: Tamara Preiss
Terri Natoli
Bill Kehoe
Jay Atkinson