


1


WP NO.
BCI performs marketing services for certain affiliates, both regulated and nonregulated. BCI bills only to affiliates. They bill to BST. BCS, BIS, DATASERV, MCCA. BSAN, BS MOBII.E DATA, AND BSE. In 1992 BCI billed all affiliates $\$ 258,470.525$. The amount billed to BST was $\$ 210.218,285$; that is 81.33\%.

Of the $\$ 210,218,185$ billed to BST, $\$ 205,011,106$ was considered regulated by BCI. That is 79.31\% of all bills to affiliates is regulated to BST, and of the amount billed to BST 97.52\% is regulated.

A schedule of the amounts to each state follows this Disclosure.
BCI has a complex procedure for determining the amounts for fully distributed costs and the amounts to allocate to regulated and nonregulated. The amounts are allocated to regulated and nonregulated at BCI, before they are billed to BST.

For explanation purposes, staff has divided BCI costs into two categories. One is those costs that are generated within BCI or billed to BCI and allocated based on various procedures directly and indirectly to the premises sales cost pool. These costs are not yet allocated to regulated and nonregulated. (Call this area "support costs" for this explanation).

The second is at the premises sales cost pool. The costs in this pool are generated by the salaries of the premises marketing sales employees. (Call this area "Premises Sales Costs"). From here they are allocated to regulated and nonregulated based upon the number of hours charged in the month. The number of regulated and dergulated hours is determined by a statistical sampling method.

For the month of May, 1992 BST was billed $\$ 18 ; 630,970 ; 34 \%$ of the costs were "Support costs" and $66 \%$ were "Premises Sales Costs".

Support costs"
There are 12 divisions within BCI which eventually allocate the majority of tier costs either directly or indirectly to Premises Sales, National Accounts and Government Sales. A small percentage is allocated to Inform each month. For the year $1 \%$ was allocated to Inform.


COMPANY:
TITLE:
PERIOD:
DATE:
AUDITOR:

SCI
Sthesary of billing Procisdures And AEIOCATIONS 50-1 AND 50-2
TYE 12/31/92
AUG 27, 1993
RI

WP No.
These allocations are either based on ratios of three months averages of salaries and wages of the division they are being allocated to or a quarterly going forward estimate of the hours of the division they arebeing alloated to. The majority of the divisions are allocated based on the salary and wages method.

Premises Sales"
The costs in this pool are salaries generated by the marketing fo- 2 employees who do the actual sales. These for the month of May are 66\%. These costs along with the "Support Costs" are allocated to regulated and nonregulated.

SO- 2 chart of the Cost Pools for both "Support Costs" and "Premises sales" also follows this disclosure. Bach cost pool notes the method of $\frac{50-2}{1-1}$ allocation.

Allocation to Regulated and nonregulated.
The total "Support costs" and "Premises Sales" are allocated to the affiliates based on the sale hours reported in the sample of sales hours prepared each month. This sample includes the hours for each affiliate and whether in the case of BST the hours are regulated or nonregulated.


MCI AUDIT DISCLOSURE 1
SUBJECT: BCI METHODS OF AIIOCATION
OPINIONS:
General
---------
PSC staff questions the re of a separate subsidiary to bill BST $81 \%$ of its costs.

Fully Distributed Costs
PSC staff determined through audit procedures that the costs are billed to affiliates at fully distirbuted cost. (This does not mean that the staff agrees with the \% used for the Return on Investment included in Fully Distributed Costs. This is addressed in Disclosure $\qquad$ ..
"Support Costs"
--*----------------
PSC staff understands the need for support services to a sales organizations and realizes that there are many methods of allocation of these support services within a sales organization.

The types of "support cost" charges for ratemaking purposes are being addressed in BCI Disclosure 3.

Allocation to Regulated and nonregulated.

PSC staff has analyzed the sampling method used to allocate both the "Support Costs" and "Premises Sales" costs to regulated and nonregulated and has certain questions regarding the method. These are addressed in BCI Disclosure 2.


COMPANY:
title: PERIOD: DATE: AUDITOR:

BCl
ANALYSIS OF DOLLARS, TO EACH STATE TYE 12/31/92
SEPT 24, 1993
FEY $\because$ !1
50-3-3

WP NO.
SOURCE: BCD 1992 BILLING SUMMAR --WP 50-1/3 AND 2-123 ATTACHMENT $\%$.



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sops
COMPANY:

BCITITLB:PERIOD:
DATE:
AUDITOR:

# ANALTSIS OF DOLLARS TO EACH STATE 

 TYB 12/31/92 SEFT 24. 1993 kKYWP NO.
SOURCEI BCI 1992 BIILIME EUMMARY $\frac{50-1}{3}$
TOTAL BILLING FROM BCI TO ALL AFFILIATES $\mathbf{2 5 8 , 4 7 0 , 5 2 5}$
TOTAL BILLING TO BST REG AND NONREG
$210,218,344$
\% BILLED TO BST REG AND NON REG FOR MARKETING
81.3317\%

TOTAL BILLING FROM BCI TO ALL AFFILIATES
258, 670,525
TO REG BILLING TO BST MARKBTING
205,012, 066
79.3174\%





TO：TIM DEVLIA，DIRECTOR，AUDITING AND FINANCIAL ANALYSIS
FROM： RUTH K YOUNG．REGULATORY ANALYST，AFA，MIAMI

RE：NARUC AUDIT－COSTING METHODOLOGIES GROUP

## FURTHER REQUESTS：

2－0？？RE：BCI
BASED ON THE INFORMATION SUPPLIED TO USE IN 2－123．ATTACHMENT II， THE PERCENT OF BILLING TO EST FOR 1992 OF TOTAL BCI BILLING WAS 81．33\％

OF THE TOTAL BILLED TO BST：97．52\％WAS REGULATED．
THE DOLLAR AMOUNTS WERE SPECIFIED CONFIDENTIAL AND ARE SENT TO KAREN KAETZ THROUGH AL CARRERAS．

WHY WAS A SEPARATE SUBSIDIARY IMPLEMENTED，WHEN 81．33\％OF THE BILLING GOES BACK TO BST AND OF THAT BILLING 97．5\％IS REGULATED IN 1992.

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Southern Bell Tel. \& Tel. Co.
FPSC Docket No. 920260
Audit
Date: 10/06/93
Item No. 2-172
Page 1 of $1, i l$

Request: RE: $B C I-$ Based on the information supplied to use in 2-123, Attachment II, the percent of billing to BST for 1992 of total BCI billing was 81.33\% of the total billed to BST; 97.52\% was regulated.

The dollar amounts were specified confidential and are sent to Karen Kaetz through All Carreras.

Why was a separate subsidiary implemented, when $81.33 \%$ of the billing goes back to BST and of that billing 97.5 is regulated in 1992?

Response: BCI was formed as a separate subsidiary, based on information obtained through business customer feedback. " Customer input indicated that BellSouth needed to be easier to do business with, and that consistency and uniformity are critical to the customer. Customers were experiencing confusion by the several different Bellsouth companies offering network, CPE, and computer products and services.

BCI can offer its business customers, as one unified organization, the ability to meet all of the integrated telecommunications needs. It can provide sales and sales support within the traditional operating company service areas, as well as account management services, for many of the nation's largest corporations. BCX essentially combined the sales efforts of South Central Bell, Southern Bell, National Accounts Division, and BCS In-region Sales into one common interface for the customer.
PSi staff/ 's Concinamitare on Page 8.

Date Provided: october 21, 1993

8

MCI AUDIT DISCLOSURE 1
SUBJECT: BCI METHODS OF allocation

ADD
INSERE-B TO MCI DISLCOSURE 1
Qpermon:
We received the company's answer as to the reason BCI was separated; but at that time it was too late in the audit to review the customer input that initiated the change and to make a comparison of the system before BCI was separated with the separated system.


COMPANY: SCI
TITLE: SUMMARY OF BELWTHES FROM BCI TO BST. ,l
PERIOD:
DATE: AUDITOR: TYE 12/31/92 SEPT 2, 1993 TRY

WP NO. 50-1
THE OBJECTIVE OF THIS SECTION IS TO DETERMINE WHAT COSTS ARE INCLUDED IN BCI BILLING TO EST: AND WHETHER BCI ALLOCATIONS TO REG AND NONREG ARB USED BY BET OR DOES EST DO THEIR OWN ALLOCATIONS TO REG AND NONREG.

POSSIBLE ISSUES : BCI IS DOING THE ALLOCATIONS TO REG AND NONREG, NOT THROUGH CAM.

WE ALSO NEED TO DETERMINE WHETHER BCI USED FDC AND CALCUALTES THE ROT CORRECTLY. THIS IS ON WP $50-2$ AND 50-8 RESPECTIVELY.

WHETHER THE COST POOLS INCLUDED IN THE ACCOUNTS THAT ARE INCLUDED IN FPC ARE ULTIMATELY ALLOCATED TO REG AND NONREG ON A REASONABLE BASIS.

POSSIBLE ISSUES: 1. DOES BCI USE FDC TO BILL BST? 50-2, 50 -is.
2. IS THE ROI CALUALTED CORRECTLY. $50-8$
3. IS THE METHOD USED TO ALLOCATE ALI. BCI EXPENSES (EXCEPT FOR THE PREMISES SALES WHICH IS BASED ON A SAMPLE SELECTION) REASONABLE. (IS THE ALLOCATION METHOD FOR ALLOCATING COST POOLS IN EACH ACCOUNT THAT ARB INCLUDED IN FPC REASONABLE?) $50^{\circ} \mathrm{Z}$
4. IS THE SAMPLE SELECTION METHOD REASONABLE FOR ALLOCTING REG AND NONREG PREMISES SALEE? JO -3

THE TYPES OF EXPENSES ARE INCLUDED. IN THE SAMPLE SECTION THAT IS 50-7.
POSSIBLE ISSUES: ARB THE TYPES OF EXPENSES INCLUDED IN THE FPC REASONABLE FOR RATEMAKING AND REOCCURRING. 50-7

BCI BILLS EST THREE TYPES OR BILL LS BACH MONTH.

1. MARKETING SERVICES
2. INFORUM
3. GOVERNMETY CONPLIANCB
I. MARKETING SERVICES:

EXPLAIN THE MARKETING SERVICES, WHAT ARE THE PRODUCTS?
GEI FROM INTERVIEWER. Description $\cap$ Serins are on
7 Serin are on $\frac{50-1}{10}, \frac{50-3}{4}$

COMPANY: BCD
TITLE: SUGARY OF BILLINGS FROM SCI TO BET.
PERIOD: TYE 12/31/92
DATE: SEPI 2, 1993
AUDITOR: SKY $\because \quad, 1$
WP NO. 50-1

WE REQUESTED BILLS FOR THE MONTH OF MAY AND OCT 92 TO BET. THE SOURCE DOCUMENTATION FOR THE BILLS INCLUDED AN ATTACHMENT THAT SHOWED THE AMOUNTS TO ALLOCATE TO REG AND NONREG.
THE ALLOCATIONS INCLUDED ROT RETURN AND ROT TAXES.
THE AMOUNTS FOR THE KCNIHS ON THE BILLS AGREED TO THE AMOUNTS FOR REG AND NONREG ON THE BILLING SUMMARY. THE TOTALS FOR MAY AND OCT ON THE BILLING SUMMARY WERE THEN TRACED TO THE TRACKING REPORTS BEFORE AND AFTER ALLOCATIONS, TRACED THE BILLING SUMMARY TO THE INCOME STATEMENT (SEQUENCE 17 ) AND AGREED (WITH RECONCILIATIONS).

THE AMOUNTS ON THE BILLING SUMMARY FOR TOTAL 1992 WERE TRACED TO THE INCOME STATEMENT FOR 1992 AND AGREED (WITH RECONCILIATION).
WP50-7/2-3.
WB CONCLUDED THAT BOTH INTEREST EXPENSE AND INCOME TAX WERE NOT INCLUDED IN THE MARKETING BILLS (FDC) OR ALLOCATIONS TO REG AND NONREG BASED ON THE RECONCILIATION OF THE BILLING SUMMARY TO THE TRACKING REPORT AND THE RECONGHLLATION OF THE INCOME STATEMENT TO THE TRACKING REPORT. THE AMOUNTS INCLUDED IN FDC ARB ON WP NO-50-gecturuSO-3.

WE HAVE NOT BEEN ABLE TO GET THE ANSWER OF WHETHER BET USES BCI ALLOCATIONS TO REG AND NONRBG YET OR WHETHER THEY DO THEIR OWN. REQ


2. INFORUM BILL

INFORUM IS A DEMONSTRATION CENTER IN ATLANTA. IT PROVIDES CAPABILITIES 12.7 for futon
deociophen FOR MARKETING AND DFMOMSTRATTONS. WP NO 50-2/1-1.THE COMPANY PER WP NO 50-2/1-1 SAYS THAT THE COSTS IN THIS BILL ARE 1) DIRECT COSTS, AND 2) ALLOCATION FROM SALES OPERATIONS ADMINISTRFATION AND SALES OPERATION SUPPORT.

THE COSTS ARE ALLOCATED TO THE INFROUM FROM SALES OPERATIONS ADMINISTARTION AND SATES OPERATIONS SUPPORT BASED ON RATIO OF 3 MTH AVERAGE OF SALARY AND WACE OF EACH GROUP.

TOTAL INFORUM COSTS AET ALLOCATED TO EST, BE, BES AND DS BASED ON THE MARKETING ALLOCATOR. TEED FINDS OUT WHAT THIS IS.

ACCORDING TO GERALD EDWARDS AND CHRIS GRIFFIN, ONLY ONE AMOUNT IS SENT TO EST AND THEN BET DETERNIEGS WHAT IS REG AND NONREG. RESPONSE STILL OUTSTANDING. $p_{2} 2-42.7$ wi $\frac{50-1}{3-3}$ deform sooth into ace 4 .
C613. Cont for l 2

COMPANY: BCI
TITLB: SUMMARY GE BInHHGS FRON BCI TO BST. PERIOD: DATE: AUDITOR:

TYE 12/31/92 SBPI 2. 1993
THY

WP NO. $\quad$ 50-1

## 3. GOVERNMENT COMPLIARICS

THIS IS AN INDIVIDUAL WHO IS RESPONSIBLE THAT PEOPLE WHO ARE GOING TO BE DEALING WITH THE FEDERAL GOVERNMENT ARE TRAINED ON HOW TO DEAL WITH THE GOVERNMENT. PER INTERVIEw WITH BCI PEOPLE. MARTHA.

THE COMPANY IN WP NO. SO-2f1-1 THAT "GOVERNMENT COMPLIANCE PROVIDES ASSURANCE OF BELLSOUTH'S COMPLIANCE WITH! STANDARDS OF CONDUCT IN DEALING WITH GOVERNMENT BODIES. INCLUDES DIRECT COST, ALLOCATION FROM BCI EXECUTIVE, BES EXECUTIVE AND FINANCE AND ADM."

BCI EXECUTIVE IS ALLOCATED TO GOV'T COMPLIANCE BASED ON A RATIO OF THE 3 MONTH AVERAGE OF SALARY AND WAGES. BBS EXECUTIVE IS ALLOCATED TO GOV'T COMPLIANCE BASED ON THE 3 MONTH AVERAGE OF SALARY AND WAGES OF THE GOV'T COMPLIANCE GROUP. ALLOCATION FROM FINANCE AND ADM BASED ON AN ESTIMATE OF QUARTERLY SALARIES. 50-2/1-1.

THE ENTIRE GOVERNMENT COMPLIANCE BILL IS ALLOCATED TO BET, BES, BS AND BE BASED ON THE GENERAL ALLOCATOR. NEED TO FIND OUT WHAT THE GENERAL ALLOCATOR IS AT BCI? $\rightarrow 5$
THE COMPANY STATED AT TEE IHEERVIEN THAT THE GOV'T COMPLIANCE BILL WAS SENT TO BET IN ONE LAMP ECK. THERE IS NO ALLOCATION BETWEEN REG AND NONREG.

WE NEED TO FIND OUT HOW EST ALLOCATES TO REG AND NONREG. REQUEST OUTSTANDING.
Per aroufto by 2.122 .7 up $\frac{50-1}{7-3}$
GowK Compo saredith Qu 46128.9, CP4.
This is alluvial ting + nom neg At w do CSS * once it goa $\rightarrow$ sits account 6728.9 .


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Southern Bell Tel. \& Tel. Co. FPSC Docket No. 920260 -TL Audit
, 1
Date: 07/26/93
Item No. 2-126
Page 1 of 2
Request: RE: BCI: Expense Tracking
A. Provide expense tracking reports before staff allocation and expense tracking reports after allocation for months of May and October, 1992.
B. Explain how the expenses get allocated to reg and nonreg. Provide documentation for months of May and October, 1992.
C. PSC staff has copies from C \& L workpapers of BCI billing methodology and procedures for allocating BCI expenses to cost pools and allocating percentage of cost pools to BST. These are pages numbers FO1KO2W 002647, 002649, 002657, 002658.

1. Please have a representative available explain how these are used to get from the expense tracking report before allocation to the expense tracking report after allocation for months of May and October. 1992.
2. Also include staff allocation summary for May and October, 1992.

Attachment $I$ contains the expense tracking reports before staff allocation for the months of May and October 1992. Attachment II is the expense tracking reports after staff allocation for the months of May and October 1992.

This material constitutes very sensitive proprietary confidential business information and any notes taken by the auditors may be the subject of a "Notice of Intent to Request Confidential Classification."

B. The staff allocation does not directly allocate -staff support costs (Executive,_-Finance,_Human Resources, etc.) to regulated or nonregulated, but rather allocates such costs to line sales cost pools. These cost pools are then allocated to BCI customers, based on customer productive hours reported ria the time reporting process. BST costs are then further allocated to the regulatory jurisdictions and to regulated and nonregulated based on customer productive time, in accordance with our documented procedures.

> Southern Bell Tel. \& Tel. Co. FPSC Docket ${ }^{\text {NO. }} 920260-\mathrm{TL}$ Audit
> Date: $07 / 26 / 93$
> Item No. $2-126$
> Page 2 of 2

Response continued:


Attachment III contains the FDC billing worksheets for documentation of this allocation for the months of May and October 1992.

This material constitutes very sensitive proprietary confidential business information and any notes taken by the auditors may be the subject of a Notice of Intent to Request Confidential Classification."

A representative will be available the week of August 23, 1993 to answer any questions or clarify any items.
C2. Attachment IV contains the staff allocation worksheets fer the months of May and October 1992. The last page of each monthly package reflects the summary.

This material constitutes very sensitive proprietary confidential business information and any notes taken by the auditors may be the subject of a "Notice of Intent to Request Confidential Classification."

Date Provided: August 23, 1993

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1-INCOME TAX ENTRY FROM EEC TAX DEPARTMENT NOT INCLUDED IN BF STAFF ALLOCATION TRACKING.

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Comenderie ESp -re
wpso-2 for peennay sep that rept

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## CONFIIENTAL

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NOTE:
STARTING WM MAY 92 THE BILLING AMOUNTS USED TO ALLOCATE POI INCLUDED THE BILLED POI. THUS, THE AMOUNTS PER THE BLING SUMMARY WERE USED IN THE ROM CALCULATIONS. THIS CHANGE WAS MADE TO SIMPLFY OBTAINING THE BILLING DATA FOR POI CALCULATION PURPOSES. NOTE THAT THE CHANGE HAS A VERY INSIGNiFICANT iMPACT ON CALCULATED ROO.

NOTICE
NOT FOR USE OR DISCLOSURE OUTSIDE
ERLSOUTH EXCEPT UNDER WRITTEN AGREEMENT




and


BellSouth Telecommunications

Room 42E62
675 W. Peachtree Street
Atlanta, GA 30375

Data: $6 / 8 / 82$

Make Payable To:
BellSouth Communications, Inc

Remit To Address:

1G1
3700 Colonnade Pkwy.
Birmingham. AL 35243

BILLNO: 05920002

TOEfL YOU FOR THE FOLOWING:

GOVT COMPLIANCE SERVICES JUL 91 THRU MAY 92 AS PER ATTACHED

DETAILS ATTACHED


NET AMOUNT DUE IN 30 DAYS

NRC
$\qquad$
-OVT COMPUANCE BILLING ATTACHMENT


NOIES
1 ALLOCATED BASED ON AMARIKETING ALLOCATOR-AVG JAN THRU MAR $92 \frac{50-1}{9}$

## ALLOCATION OF GOVT COMPLIANCE

CALCULATION OF MARKEIING ALLOCATOR-GOV'T COMPIIANCE 1992 ,

| MONTH | ESE | BCS | DS | BST | TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-92 | 30,745,804 | 4,921,370 | 1,279,000 | 48,988,171 | 85,934,345 |
| Feb-92 | 28,803,994 | 5,331,841 | 916,000 | 53,186,137 | 88,237,972 |
| Mar-92 | 29,878,258 | 5,180,011 | 995.000 | 50,100,254 | 86,153,523 |
| Apr-92 | 33,380,16B | 4,522,784 | 954,000 | 61,358,482 | 100,215,434 |
| May-92 |  |  |  |  | 0 |
| Jun-92 |  |  |  |  | 0 |
| Jul-92 |  |  |  |  | 0 |
| Aug-92 |  |  |  |  | - 0 |
| Sep-92 |  |  |  |  | 0 |
| Oct-92 |  |  |  |  | 0 |
| Nov-92 |  |  |  |  | 0 |
| Dec-92 |  |  |  | * | 0 |
| AVERAGES |  |  |  |  |  |
| APR-1/92-3/92 | 29,809,352 | 5.144,407 | 1,063,333 | 50,758.187 | 86,775,280 |
| MAY-2/92-4/92 | 30,687,473 | 5,011,545 | 955,000 | 54,881,624 | 91,535,643 |
| JUNE-3/92-5/92 | 21,086,142 | 3,234,265 | 649.667 | 37,152,912 | 62,122,986 |
| JULY-4/92-6/92 | 11,126,723 | 1,507,596 | 318,000 | 20,452,827 | 33,405,145 |
| AUGUST-6/92-7/92 | 0 | 0 | 0 | 0 | 0 |
| SEPT-6/92-8/92 | 0 | 0 | 0 | 0 | 0 |
| OCT-7/92-9/92 | 0 | 0 | 0 | 0 | 0 |
| NOV-8/92-10/92 | 0 | 0 | 0 | 0 | 0 |
| DEC-9/92-11/92 | 0 | 0 | 0 | 0 | 0 |
| \% |  |  |  |  |  |
| APR-1/92-3/92 | 34.35\% | 5.93\% | 1.23\% | 58.49\% | 1.00 |
| MAY-2/92-4/92 | 33.53\% | 5.47\% | 1.04\% | 59.96\% | 1.00 |
| JUNE-3/92-5/92 | 33.94\% | 5.21\% | 1.05\% | 59.81\% | 1.00 |
| JULY-4/92-6/92 | 33.31\% | 4.61\% | 0.95\% | 61.23\% | 1.00 |
| AUGUST-5/92-7/92 | \#NUMI | \#NUMI | \#NUMI | \#NUMI | \#NUM1 |
| SEPT-6/92-8/92 | \#NUM! | \#NUMI | \#NUM! | \#NUM! | \#NUM! |
| OCT-7/92-9/92 | \#NUMI | \#NUMI | NNUM! | \#NUMI | \#NUMI |
| NOV-8/92-10/92 | "NUM! | \#NUMI | *NUMI | \#NUM! | \#NUMI |
| DEC-9/92-11/92 | \#NUM | \#NUM! | *NUMI | \#NUMI | \#NUMI |



Item No. 2-122.4n nttachment
GOVT COMTLIANCE BLLING ATTACHMENT-NNCLUDES TRUE UN AS OF 6/92,

This is Guare bill
$\lambda$
NOTES
1 allocated based on general allocatop-avg jan thru mar g2. 2 allocated based on genebal allocatorang feg thru aph 92
3 ALLOCATED BASED ON GENERAL ALLOCATOP-AVG MAR THRU MAY 92


CONFIDENTIML

BELLSOUTH COMMUNKCATIONS, NC. FOIKEEN H10984 .



ALLOCATIÓN OF GOVT CONIPLIANCE

| MONTH | BSE | BOS | 06 | BST | TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: |
| OCTOGER COST Allocation | 3,025.61 | . 200.96 | 68.24 | 9,599.20 | 12,894.00 |
| OCTOBER ROX | 11.56 | 1.89 | 9.28 | -190.4747 | 148.20 |
| OCTOEER TOTAL ELLING | 3,037.17 | 202.85 | 77.52 | 24.6 | (042 |

$v=\underset{\substack{\text { sol }}}{\text { ages }}$ with Bielr fuerr $\gamma$

aVERAGES
APR-1/92-3/92
MAY-2/92-4/92
JUNE-3/92-5/92
JULY-4/92-6/92
AUGUST-5/92-7/92
SEPT-6/92-8/92
OCT-7/92-9/92
NOV-8/92-10/92
DEC- $8 / 82-1$ 1/92

81,436,667
82,804,667
6.643,333

8,498,333
8,513,667
8,432,687
8.713,667

8,794,000 8,899,333 5.907,333

2,054,687

| $2,958,333$ | $416,518,000$ | $509,556,333$ |
| ---: | ---: | ---: |
| $2,841,867$ | $411,216,667$ | $505,362,33$ |
| $2,892,667$ | $408,217,000$ | $502,576,000$ |
| $2,930,000$ | $410,350,667$ | $503,517,667$ |
| $3,042,667$ | $417,311,687$ | $535,342,533$ |
| $3,077,867$ | $422,562,667$ | $540,393,623$ |
| $3,022,000$ | $425,099,333$ | $571,009,243$ |
| $1,961,000$ | $282,370,333$ | $370,265,043$ |
| 946,667 | $142,507,687$ | $200,017,953$ |

\%
APR-1/92-3/92
MAY-2/92-4/92
JUNE-3/92-5/92
JULY-4/92-6/92
AUQUST-5/92-7/92
SEPT-6/92-8/92 OCT-7/92-9/92 NOV-8/92-10/92 DEC-9/92-11/82

| $15.98 \%$ | $1.70 \%$ | $0.58 \%$ | $81.74 \%$ | 1.00 |
| :--- | :--- | :--- | :--- | :--- |
| $16.39 \%$ | $1.68 \%$ | $0.58 \%$ | $81.37 \%$ | 1.00 |
| $16.51 \%$ | $1.69 \%$ | $0.58 \%$ | $81.22 \%$ | 1.00 |
| $18.25 \%$ | $1.67 \%$ | $0.58 \%$ | $81.50 \%$ | 1.00 |
| $19.85 \%$ | $1.63 \%$ | $0.57 \%$ | $77.95 \%$ | 1.00 |
| $18.61 \%$ | $1.63 \%$ | $0.57 \%$ | $78.20 \%$ | 1.00 |
| $23.47 \%$ | $1.66 \%$ | $0.53 \%$ | $74.45 \%$ | 1.00 |
| $21.61 \%$ | $1.60 \%$ | $0.53 \%$ | $76.26 \%$ | 1.00 |
| $26.80 \%$ | $1.48 \%$ | $0.47 \%$ | $71.25 \%$ | 1.00 |




NET AMOUNT DUE IN $3 O$ DAYS
N／C
TOTAL AMOUNT
\＄259．588．48

## ALLOCATION OF INFORUM COST

CALCULATION OF MARKETHE ALLOCATOR－INFORUM $19: 12$

| MONTH | ESE | ECS | DS | BST | TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan－92 | 18，464，786 | 4，921，370 | 1，279，000 | 48，988，171 | 73，643，327 |
| Feb－92 | 15，123，481 | 5，331， 841 | 916，000 | 53，186，137 | 74，557，459 |
| Mar－92 | 17，868，930 | 5，180，011 | 995，000 | 50，100，254 | 73，944，195 |
| Apr－92 | $19.558,443$ | 4，522，784 | 954，000 | 61，358，482 | 86，393，709 |
| May－92 |  |  |  |  | 0 |
| Jun－92 |  |  |  |  | 0 |
| Jul－92 |  |  |  |  | 0 |
| Aug－92 | － |  |  |  | 0 |
| Sep－92 |  |  |  |  | 0 |
| Oct－02 |  |  |  |  | 0 |
| Nov－92 |  |  |  |  | 0 |
| Dec－92 |  |  |  | ． | 0 |


| AVEAGGES |  |  |  |  |  |
| :---: | ---: | ---: | ---: | ---: | ---: |
| APR－1／92－3／92 | $17,082,399$ | $5,144,407$ | $1,063,333$ | $50,758,187$ | $\mathbf{7 4 , 0 4 8 , 3 2 7}$ |
| MAY－2／92－4／92 | $17,450,285$ | $5,011,545$ | 955,000 | $54,881,624$ | $78,298,454$ |
| JUNE－3／92－5／92 | $12,409,124$ | $3,234,265$ | 649,667 | $37,152,912$ | $53,445,968$ |
| JULY－4／92－6／92 | $6,519,481$ | $1,507,695$ | 318,000 | $20,452,827$ | $28,797,903$ |
| AUGUST－5／92－7／92 | 0 | 0 | 0 | 0 | 0 |
| SEPT－6／92－8／92 | 0 | 0 | 0 | 0 | 0 |
| OCT－7／92－9／92 | 0 | 0 | 0 | 0 | 0 |
| NOV－B／92－10／92 | 0 | 0 | 0 | 0 | 0 |
| DEC－9／92－11／92 | 0 | 0 | 0 | 0 | 0 |

\％

| APR－1／92－3／92 | 23．07\％ | 6．95\％ | 1．44\％ | 68．55\％ | 1.00 |
| :---: | :---: | :---: | :---: | :---: | :---: |
| MAY－2／92－4／92 | 22．29\％ | 6．40\％ | 1．22\％ | 70．09\％ | 1.00 |
| JUNE－3／92－5／92 | 23．22\％ | 6．05\％ | 1．22\％ | 69．51\％ | 1.00 |
| JULY－4／92－6／92 | 22．64\％ | 5．24\％ | 1．10\％ | 71．02\％ | 1.00 |
| AUGUST－5／92－7／92 | WiHAMI | WNUMI | \＃NUMI | \＃NUM1 | \＃NUMI |
| SEPT－6／92－8／92 | W108M！ | \＃NUMI | \＃NUM！ | \＃NUM！ | \＃NUMI |
| ．OCT－7／92－9／92 | ＊N星界 | ＊NUM！ | \＃NUM！ | \＃NUMI | WNUMI |
| NOV－8／92－10／92 | nnilml | \＃NUMI | \＃NUM！ | \＃NUM！ | \＃NUA！ |
| DEC－9／92－11／92 | WNRM！ | WNUMI | \＃NUM！ | \＃NUM！ | WNUMI |


| MAY Billina | 72.803 .89 | 20，908．54 | 3，984．33 | 228，970．24 | 326，667．00 |
| :---: | :---: | :---: | :---: | :---: | :---: |
| MAYROI | 9，737．20 | 2，795．79 | 532.95 | 30.618 .24 | 43，684．18 |
| MAY TOTAL BILLING | 82.541 .09 | 23，704．33． | 4，517．28 | 200608948 | 70．351．18 |
| $V=$ agu．w／bill | $\frac{50.1}{3}$ |  |  | 259，588 | $\text { fy } 2$ |



voc

NET AMOUNT DUE IN 30 DAYS

## ALLOCATION OF INFORUMI COST

CALCULATION OF MAFACETAMG ALLOCATOR-INFORUM 1992
MONTH ESE BCS BOTAL

Oct-92
TOTAL COST BILLING TOTAL ROI BILLING TOTAL BILLING

| $67,350.10$ | $21,002.39$ | $2,355.86$ | $235,164.65$ | $325,873.00$ |
| ---: | ---: | ---: | ---: | ---: |
| $8,447.01$ | $2,724.88$ | $1,528.03$ | $33,519.19$ | $46,219.11$ |
| $75,797.11$ | $23,727.27$ | $3,883.89$ | $268,683.84$ | $372,092.11$ |

ALLOCATION OF INFORUM COST

CALCULATION OF MARKETANG MLOCATOR-INFORUM 1992

| MONTH | EEE | BCS | D8 | EST | TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-92 | 18,454.786 | 4,921,370 | 1,279,000 | 48,988,171 | 73,643,327 |
| Feb-92 | 15,123,481 | 5,331,841 | 916,000 | 53,186,137 | 74,557,459 |
| Mar-92 | 17,668,930 | 5,180,011 | 996.000 | 50,100,254 | 73,844,195 |
| Apr-92 | 19,558,443 | 4,522,784 | 954,000 | 61,358,482 | 86,393,709 |
| May-92 | 15,152,747 | 5,226,615 | 1,282,908 | 53,880,337 | 75,542,607 |
| Jun-92 | 16.287,670 | 4,063,912 | 642,319 | 58,118,050 | 79,912,950 |
| Jul-92 | 16,888,911 | 5,175,454 | 684,181 | 58,000,623 | 80,749,169 |
| Aug-92 | 15,194,062 | 4,996,850 | 546,577 | 58,501.026 | 70.238,514 |
| Sep-92 | 17,436,595 | 5,269,827 | 501,403 | 56,404,573 | 79,612.397 |
| Oct-92 |  |  | 672,928 |  | 672,928 |
| Nov-92 |  |  |  |  | 0 |
| Dac-92 |  |  |  |  | 0 |
| AVERAGES |  |  |  |  |  |
| APR-1/92-3/92 | 17,082,39\% | 5,144,407 | 1,083.333 | 50,758,187 | 74,046,327 |
| MAY-2/92-4/92 | 17,450,285 | 5,011,545 | 965,000 | 54,881,624 | 78,298,454 |
| JUNE-3/82-5/92 | 17,460,040 | 4,976,470 | 1.077.303 | 55,113,024 | 78,626,837 |
| JULY-4/92-6/92 | 16,099,620 | 4,871,104 | 959,742 | 57,785,956 | 80,616,422 |
| AUGUST-8/92-7/92 | 16,109,776 | 6.088,660 | 869.803 | 56,666,870 | 78,734,909 |
| SEPT-6/02-8/92 | 16,123,548 | 5.012 .072 | 624,359 | 58,206,900 | 79,966,878 |
| OCT-7/92-9/92 | 16,506,523 | 5,147,377 | 677,387 | 57,635,407 | 79,868,694 |
| NOV-8/92-10/92 | 10,876,886 | 3,422,225 | 573,638 | 38,301,866 | 53,174,613 |
| DEC-8/92-11/92 | 5,812,10日 | 1.756,609 | 301.444 | 18,804,524 | 26,781,775 |
| \% |  |  |  |  |  |
| APR-1/92-3/92 | 23.07\% | 6.95\% | 1.44\% | 68.65\% | 1.00 |
| MAY-2/92-4/92 | 22.29\% | 6.40\% | 1.22\% | 70.09\% | 1.00 |
| JUNE-3/92-5/92 | 22.21\% | 6.33\% | 1.37\% | 70.09\% | 1.00 |
| JULY-4/92-6/92 | 21.09\% | 6.04\% | 1.10\% | 71.68\% | 1.00 |
| AUGUST-5/92-7/92 | 20.46\% | 6.46\% | 1.10\% | 71.97\% | 1.00 |
| SEPT-6/92-8/92 | 20.16\% | 6.27\% | 0.78\% | 72.79\% | 1.00 |
| OCT-7/92-9/92 | 20.67\% | 6.44\% | 0.72\% | 72.16\% | 1.00 |
| NOV-8/92-10/02 | 20.46\% | 6.44\% | 1.08\% | 72.03\% | 1.00 |
| DEC-9/92-11/92 | 21.72\% | 6.56\% | 1.46\% | 70.26\% | 1.00 |



FINANCIAL SYSTEMS DOCUMENTATION
APPLICATLON ABO1: CSS/PPS USER GUIDE
PART
SECTION
3.04.2 CPO1 is allocated to regulated/nonregulated based on the ratio of hours reported by product in BBS. All BBS hours are accumulated by product and by state. The total hours for each state are divided into the individual product hours resulting in BBS ratios by product by state. These ratios are multiplied by the cost pool dollars by RC for the assignment to regulated/monregulated products.
3.05.1 CPO2 contalms the following JFCS:

2230 KX

JAN 161992
9.19 .3

NOTICE: NOT FOR USE OR DISCLOSURE OUTSTDE BELISOUTH EXCEPT UNDER WRITTEN AGREEMENT

| APPLICATION ABOZ: CSS/PPS USER GUIDE |  |  |
| :--- | ---: | :--- |
| PART | $9:$ | CSS INVESTMENT AND EXPENSE APPORTIONMENT |
| SECTION | $19:$ | CUSTOMER OPERATIONS EXPENSE |

3.05.2 CP02 is directly assigned.
3.06.1 CP03 SP02 contains the following JFCs:

| $223 A$ | $223 B$ | $223 E$ | $223 F$ | $223 G$ | $223 H$ |
| :--- | :--- | :--- | :--- | :--- | :--- |
| $223 J$ | 223 K | 223 L | 223 N | 223 R | 223 U |
| 223 V | 223 F | 223 Y | 2232 | 223 Z | 2238 |
| 2239 |  |  |  |  |  |

3.06.2 CP03 SP02 is assigned to regulated/nonregulated based on
3.07.1 CPO5 SP02 contains the following JFCs:

225XXX
3.07.2 CPO5 SP02 is directly assigned.
3.08.1 CPO5 SP03 contains the following JFCs: $2210 x \mathrm{2} 21 \mathrm{CXX} 2211 \quad 221147 \quad 221+++$
3.08.2 CP05 SPO3 is directly assigned.
3.09.1 CP05 SPO4 contains the following JFCs:

228XXX 5XXXXX (excluding 5512XX)
3.09.2 CPO5 SPO4 is directly assigned.
3.10. CP05 SPO5 contains the following JFCs:

227 XXX
3.10.2 CP05 SP05 is directly assigned.
3.11.1 CP05 SP06 contains the following JFC:

5512 with an EXTC of 40 OH
3.11.2 CP05 SP06 is directly assigned.
3.12.1 CP05 SP07 contains the following JFCs: $5512 X X$ excluaing 5512 with an EXTC of 40 .
3.12.2 CPO5 SP07 is dixectly assigned.

NOTICE: NOX FOR USE OR DISCLOSURE OUTSIDE BELLSOUTH EXCEPT UNDER WRITTEN AGREEMENT

## FLORIDA PUBLIC SERVICE COMMISSION

 DOCUMENT / RECORD REQUEST
## to: <br> Ale carreras

unity:
from: Gabriela tho

| DATE OF REQUEST: $-8 / 11 / 93$ |
| :--- |


REQUEST THE FOLOWNG TEXAS) BE PROVIDED BY


REFERENCE RULE 25-22.006. F.A.C., THIS REQUEST IS MADE: ITEM DESCRIPTION: Please provide the TOB Function cone manual
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$

TO: AUDIT MANAGER
DATE $\qquad$
THE REQUESTED RECORD OR DOCUMENTATION:
(1) HAS BEEN PROVIDED TODAY
(2) CANNOT BE PROVIDED IN THREE (3) WORK DAYS BUT WILL BE MADE AVAILABLE BY $\qquad$
(3) AND IN MY OPINION THS MATERIAL IS PROPRIETARY AND CONFIDENTAL BUSINESS INFORMATON AS DEFINED IN 364.183. 366.093. OR 367.156. F.S. I UNDERSTAND THAT TO OBTAIN TEMPORARY CONFIDENTIAL HANDLING ANOTICE OFINTENTMUST BE FILEDWTTHTHEDIVSIONOF RECORDS AND REPORTING. TOMAINTAINCONTINUED CONFIDENTALHANDUNG OFTHISMATERIALTHEUTIUTYOR OTHER PERSON MUST, WITHIN2IDAYS AFTERTHE COMMISSIONSTAFF HAS OBTAINED THE MATERIAL CORINTHE CASE OFMAIERIAL OBTAINED DURINGTHECOURSE OF AN AUDIT, MITHIN2IDAYS AFTER THE AUDIT EXIT CONFERENCE) FILE A REQUEST FOR CONFIDENTAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006 F.A.C.
(4) THE ITEM WILL NOT BE PROVIDED. ( SEE ATTACHED MEMORANDUM)


## DISTRIBUTION:

Original: Utility Complete and Return to Auditor Pink: To FPSC Analyst Goldenrod: Audit File Copy Canary: Utility Retain


BELLSOUTH
$\stackrel{\leftrightarrow}{\circ}$
COST APPORTIONMENT TABLES

| $\begin{aligned} & \text { USOA } \\ & \text { PART } 32 \text { ACCT. } \\ & \hline \end{aligned}$ | COST POOLS | BASIS FOR APPORTIONMENT TO COST PCOLS | GASIS FOA APPORTIONMENT TO PEGULATEDNONREGULATED | $\underset{\text { DEFINTHON }}{\text { COST }}$ | COMMENTS |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 6613 <br> Product <br> Advertising (Cent) | Advertishing Generk/ Combined | Identified trom Auxction codes | Markethog Allocator | Unattitutable |  |
| 6621 <br> Call Completion servitus | Same js Account | Cost pool equels account less Centralzed Coin Retund Center pool | Orectly asslgned to requated | Directly Assignable |  |
|  | Cormallevid Com flefund Canter | Identiled from function codes | Com Refund Statistics | Indecectly Attributable |  |
| 6622 <br> Number Servicts | Same as Account | Cost pool equals account | Oreetly asstoned to regulated | Drectly Asslgnable |  |
| 6623 <br> Customer Services | Orect Requated/ Nonregciated | identilied from functos codes | Dirctity asslgned to regulated/ norrequiluted | Drectly <br> Assignabie | Includes the cost of reguated customer servees. such as carrier access blling system expenses. ioll message procesing. local message operations, interexchange customer service centers, annoyance call buresu/street address gulde. interexchange und currier sales and nowregulated customer services drectly reported to requeted/nonregulated function. |
|  | Sencics Order Processing | Identilied from function codes | Analysis of service order activty | Okectly Attributable | - |
|  | aming and Collection Operations | Identilied from function codes | Anelysls of bill ines printed | Drecty Attributable |  |

BELLSOUTH
COST APPORTIONMENT TABLES
TABLE NINE

| USOA <br> PART 32 ACCT. <br> 6623 | $\frac{\operatorname{cost~PCOLS~}}{\text { Sentice }}$ | QASIS FOR AFPORTIONMENT TO COST POOLS | BASIS FOP APPOPTONMENT TO REGUUATED/NONREGUUTED | $\begin{gathered} \text { COST } \\ \text { DEFINTION } \end{gathered}$ | COMMENTS |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 6623 <br> Customer Services (Cont) | Service Conter Soles | Idenumed from hunction codes | Based on trme stucles |  |  |
|  |  |  | Based on ume sturles | Indrectly Attritutable |  |
|  | Customer Services. Piblic Telephone Operations | Idemined from kenction codes | Relative Sent-Pald revenues ussocloted with coln telephone use and collections | Indirectly Attributable |  |
|  | Customer Instruction Services | Identified from function codes | Marketing Allocator | Unetiributable |  |

BellSouth Commuications, Inc. (BCI) is a wholly owned gubsidiary of BellSouth Business Systems, Inc. BCI provides business sales activities for BST network products and services. It also marketa telecomunication and data products and eervices of other zellsouth Companies.

SERVICES PROVIDED TO BCI

|  | DESCRIPIION- ${ }^{\text {OF SERVICES }}$ | EREQUENCY | AFFILIATE RULE |
| :---: | :---: | :---: | :---: |
| - | Aircraft | Daily | Fully Distributed Cost |
| - | Procurement and Provisioning Services | On Request | Fully Distributed Cost |
| - | Telecommunications services including official communications | Daily | Tariffed Rates/ Prevailing Market Rate |
| - | Shared office epace and support services | Daily | Fully Diatributed Cost |
| - | Use and Maintenance of General Purpose Computer Systems | Daily | Fully Distributed Cost |
| - | Internal Auditing | Daily | Fully Distributed Coat |
| - | Legal | On Request | Fully Distributed Cost |
| - | Corporate Medical | On Request | Fully Distributed Cost |
| - | Personnel Servicea | On Request | Fully Digtributed Cost |
| - | Customer Referral | Daily | Fully Diatributed Cost |
|  | Enhanced Voice Measaging | Daily | Fully Distributed Cost |
|  | Training | On Request | Fully Digtributed Cost |
| - | Marketing Support | On Request | Fully Distributed Cost |


| SERVICES ${ }^{\text {P PROVIDED TO BCI (CONT) }}$ |  |  |  |
| :---: | :---: | :---: | :---: |
|  | DESCRIPTION OF SERVICES | FREQUENCY | AFFILIATE RULE |
| - | Human Resources | On Request: | Fully Diatributed Cost |
| * | Incidental CPE Maintenance, Installation, and Testing | On Request | Fully Distributed Cost |
| * | Treasury and Accounting Support | Daily | Fully Diatributed Cost |
| - | Procurement and Management of Bellcore Services | Daily | Fully Distributed cost |
| SERVICES RFCEIVED FROX BCI |  |  |  |
|  | DESCRIPTION OF SERVICES | FREOUENCY | AFEILIATE RUTE |
| - | Sales Activities For Business Cubtomers For Telecommunications Network Products and Services | Daily | Fully Distributed Cost or Lese |
| - | Government Compliance | Daily | Fully Distributed Cost or Less |

BELLSOUTH COMMUNICATIONS SYSTEMS, INC.

BellSouth Communication Systems, Inc. (BCS) is a wholly owned gubsidiary of BellSouth Business Systems. BCS maxkets and maintaing voice and data communications aystems and related products. BCs carries a product line of highly adranced, fully integrated voice and data telephone and information management systern, computerized key systems, telecommunications management computers; and related peripheral devices.

SERVICES PROVIDED TO BCS

DESCRIETION OF SERVICES
Telecommunications Services including official communicationg

- Use and maintenance of General Purpose Computer Systems

| FREQUENCY | AFFILIATE RULE |
| :--- | :--- |
| Daily | Tariffed Rates/ <br> Prevailing Market <br> Rate |
| Daily | Fully Diatributed <br> Cost |



BELLSOUTH BUSINESS SYSTEMS, INC.

BellSouth Business Systema, Inc. (BBS) is a holding company for Bellsouth Communications, Inc. BellSouth Communications Systema, Inc.. Datagerv, Inc. and BellSouth Financial Services Corporation. BBS is a wholly owned aubaidiary of BST.




Request: RE: BCI. Explain how the general allocator is developed within BCI which is used to allocate the government compliance bill to BST, etc. Provide detail and documentation for month of May, 1992.:

Response: The general allocation for Government Compliance is computed by dividing the average 3 months total operating expense (TOE) less the average 3 months cost of sales (COS) for BST, BSE, BCS and DataServ into a specific company's TOE less its COS. An example for BST allocator would be:

mex develops the allocations from data provided by each company as follows:

Amounts for BST, BCS, and DataServ are obtained from the monthly FACTS income statements for each company. The amounts for BSE are forwarded to BCI accounting via memo. Note that the early months of 1992 data for BSE were obtained via phone calls to BSE finance personnel.

Details supporting the May 1992 Government Compliance general allocator are being sent in the overnight mail on September 30, 1993.

This material constitutes proprietary confidential business information and is being produced subject to a "Notice of Intent to Request Confidential classification."

They amount o agree $\omega /$ BCI Biller Sumer
$\frac{\text { So- }}{3}$ Ser so-1 for calculator

Date Provided: September 30, 1993
?

(1)
Item Mo. 2-122.7A
Attachment


total corrected bung PREViOUS BLING AS PER ATTACHED

PROPRIETTAIKI
1 allocated based on general allocator -avg jan thru mar 92.
2 ALLOCATED BASED ON GENERAL ALLOCATOR-AVG FEB THRU APR 92.
3 allocated based on general allocator -avg mar thru may 92.
4 TRUE UP WAS REQUIRED AS THE ALLOCATION FACTOR FOR GOUT COMPUANCE WAS CHANGED FROM THE MKT ALLOCATOR TO THE GENERAL ALLOCATOR AT THE REQUEST OF BEL SOUTH CORP. ALL PREViOUS BLING WERE RECALCULATED based on the general allocator.

## 

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desenghi $\%$ Gov'
BELLSOUTH COMMMNHCATOONS, INC.



ePORT ATGUIRRI



EPORT A74U1RRI

REPORT PERIOO:
dataserv Inc
I NCOME STATENENT dOLLARS IN THOUSANOS

(3)






FEB 92

$$
\begin{gathered}
\text { QELLSL TELECOMMUNICATIONS CONSOLIDATED } \\
\text { I NCOHESSTA TE HENT } \\
\text { OOLLARS IN THOUSANDS }
\end{gathered}
$$




[^0] PACE 1

REPDRT ATKRIRR BELLSOUTM TELECOMAMICATIONS

BELLSOUTH TELECOMANICATIONS
I MCOME STATENEN dOLLARS IM THOUSAKOS

```
                                    MAR }9
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* NOIE: These lines reflect the results of Bellsouth Business systems Consolidated and Bellsouth Products recorded at equity.


[^1]


Request: Explain how themaxketing allocator is developed within BCI which is used to allocate Inform costs to BST, BSE, etc. Provide detail and documentation for the month of May. 1992.

Response: Attachment $I$ is a document titled "BCI Billing for Inform Cost" which outlines how the marketing allocator is developed. Attachment II is the backup document supporting the marketing allocator for the month of May 1992.

BCI develops the allocation from marketing data provided by the companies as follows:

BST provides BCI with an internally generated document which gives the marketing cost for BST. 2 2sE sends BCI a mem each month outlining the marketing cost of BSE. 3 The marketing cost for BCS and (Pataserv are taken from internally prepared incolie statements.

These attachments are being sent in the overnight mail on September 29, 1993.

This material constitutes very sensitive proprietary confidential business information and any notes taken on this material may be the subject of a "Notice of Intent to Request Confidential classification."

The mar letting
albentor sears sea mile to no
as infourn is a manketing Tool, H

## 

Date Provided: September 29, 1993



BSE's percentage $=A / E$
BST's percentage $=\mathrm{B} / \mathrm{E}$
BCS's percentage $=\mathbf{C} / E$
Dataserv's percentage $=\mathrm{D} / E$
BSE would bill the inforum costs to their subsidiaries based on their own internal allocator.

BST would bill the Inforum costs to the states through the ICIC process.


CALCULATION OF MARKETING ALLOCATOR-INFORUM 1992


## AVERAGES

$$
\begin{gathered}
\text { APR-1/92-3/92 } \\
\text { MAY-2/92-4/92 } \\
\text { JUNE-3/92-5/92 } \\
\text { JULY-4/92-6/92 } \\
\text { AUGUST-5/92-7/92 } \\
\text { SEPT-6/92-8/92 } \\
\text { OCT-7/92-9/92 } \\
\text { NOV-8/92-10/92 } \\
\text { OEC-9/92-11/92 }
\end{gathered}
$$


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APR-1/92-3/92
MAY-2/92-4/92 JUNE-3/92-5/92 JULY-4/92-6/92 AUGUST-5/92-7/92 SEPT-6/92-8/92 ОСТ-7/92-9/92 NOV-8/92-10/92 DEC-9/92-11/92

## PROPRRIUETTARY


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EST ALLCCATJO! OF INFOELH COSTS: GSE MARJETING LOST ALLD:A:C: IIN MHOLS:

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May 20, 1992

TO:
Gerald Adams
FROM:
Maliece Whatley
SUBJECT: BSE Marketing Report

Attached is BSE's marketing report for the month of:

APRIL 1992

This report provides BSE's marketing expense net of the current month Inform expense, A\&P marketing costs, and marketing costs of the international subsidiaries. This amount is used in allocating the costs of Inforum among subsidiaries.

Do not hesitate to contact me at $249-4045$ if you have any questions.
ynaliece






REVENUES

COST OF SALES

GROSS MARGIN S
GROSS MARGIN \%
SELLINO EXPENSES
BCI CRQSS CHARGES
MARKETING EXPENSE
PREG \& A CONTRIBUTION
G \& A HXPENSES
MANAGEMENT FEES
INTEREST EXPENSE

INCOME BEFORE TAXES

INCOME TAXES
NET INCOME


## CONSOLIDATED INCOME STATEMENT PEBRUARY 29, 1992 <br> (TN THOUSANDS)

## REVENUES

## COST OF SALES

## GROSS MARGIN S

GROSS MARGIN $\boldsymbol{q}$

## SELLING EXPENSES BCD CROSS CHARGES Marketing expense

PRE O \& A CONTRIBUTION


MANAGEMENT FEES
INTEREST EXPENSE

INCOME BEFORE TAXES

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NET INCOME





## mccount beacripition

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cause I
REPORT FOR : BSD DA. MONTH : 9208
TOTAL MARKETING COSTS BY COMPANY
06/01/92
05.52. 15

## COMPANY

SOUTH CENTRAL BELL | STATE |  |
| :--- | :--- |
|  | RI |
|  | ILA |
|  | MS |
|  | TN |

*TOTAL SOUTH CENTRAL BELL SOUTHERN BELL

FL
GA
$N C$
SC
$25,468,812.63$
15, 627, 023.15
9, 632,970.03
6,620,444.95
4,009,231.27
*TOTAL SOUTHERN BELL
$35,889,669.40$
TOTAL

$$
61,358,482.03
$$

* 





Southern Bell' Tel. \& Tel. Co. FPSC Docket No. 920260 -TL Audit
Date: 09/14/93
Item No. 2-127.3
Page 1 of 1 ,

Request: RE: BCI. Provide a description of the following marketing services offered by BCI. Note whether regulated or deregulated.

Call Accounting system
DCA Datacom
Automated attendant positions
Data Private lines
Esse Automatic Cal. Distrib.
Local Area Data Service
Inside Wire complex
Northern Telecom PBX
Focus Hybrid System
All Synchronet Services
Pulselink

Response: Please note that the items requested are offered by other BellSouth companies, rather than by BCI. BCI merely markets these products and services to customers. Refer to the product listings provided in response to Item No. 127.2 for the descriptions.

ITEMS REQUESTED
LORI CODE REG/NONREG

| Call Accounting System | 122 | Nonreg |
| :--- | :--- | :--- |
| DCA Datacom | 113 | Nonreg |
| Automated Attendant Positions | 146 | Nonreg |
| Data Private Lines | 046 | Reg |
| EssX Automatic Call Distribution | 007 | Reg |
| Local Area Data Service | 050 | Reg |
| Inside Wire Complex | 147 | Nonreg |
| Northern Telecom PBX | 133 | Nanreg |
| Focus Hybrid System | 131 | Nonreg |
| All Synchronet Services | 139 | Reg |
| Pulselink |  | Reg |



| APPLICATION | ABO1: | CSS/PPS USER GUIDE | Item Mo. 2-127.2 |
| :--- | ---: | :--- | ---: |
| PART | $1:$ | GENERAL DESCRIPTION | Attachment II |
| SECTION | $3:$ | PRODUCT DEFINITIONS |  |
| SUBSECTION | $1:$ | CSS PRODUCTS |  |



## DATA COMMUNICATIONS - CUSTOMER PREMISES EQUIPMENT (CPE)

8.01 Data Communications equipment includes terminals, printers, modems, channel service units/data service units, multiplexers, and complementary equipment, and analog or digital data transport facilities. Listed below are individual vendors assigned to these products.

Product Vendor/Product
110 Datacom - General
111 Paradyne Corporation- Datacom
112 Infinet - Datacom
113 Digital Communications Associates, Inc. (DCA) Datacom
114 Universal Data Systems (UDS)- Datacom
115 Northern Telecom, Inc. (NTI)- Datacom
116 Datacom - Other
117 Digital Equipment Corporation (DEC)- Computer Systems
118 International Business Machines - Computer Systems
119 DV1 - Computer Systems
120 Computer Systems - Other
121 Vertical Software
122 Call Accounting
135 PCA Accruals (Data)


VOICE-KEY - PE
9.01 Voice products and services include single line telephones and key systems based services (facilities and switching equipment) which support voice communications. Listed below are CPE vendors assigned to these products.

JUL 021991


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BELLSOUTH EXCEPT UNDER WRITHEN AGREEMENT

| APPLICATION | ABO1: | CSS/PPS USER GUIDE |
| :--- | ---: | :--- |
| PART | $1:$ | GENERAL DESCRIPTION |
| SECTION | $3:$ | PRODUCT DEFIMITIONS |
| SUBSECTION | $1:$ | CSS PRODUCTS |



PRODUCT 149 - CPE - NONBASIC INSIDE HIRE GFNERAL
12.01 A11 amounts for Product 149 are respread to LOBIs 111 through 148, excluding LOBIs 123 and 132 . The respread methoroloyy used is described in Part 13, Section 4.

JUL 021991

1.3.1.4



WP 50-2 INTRODUCTION
THE OBJECTIVE OF THIS SECTIONS IS TO DETERINE WHETHER BCI AS AN AFFILIATED COMPANY IS BILLING EST AT FULLY DISTRIBUTED COST AS CALLED FOR IN THE CAM. WP NO $\frac{1-6}{4}$ is THE RULE ASSOCIATED WITH THE COSTING METHODOLOGY.

BRIEFLY, BCI IS A COST CENTER AND HAS NO PRODUCTS OF ITS OWN.
THE STEPS TO ALLOCATION FOLLOW:
 AND THEN THESE COSTS GET ALLOCATED WITHIN BET FROM THE TOP DOWN TO THE PREMISES SALES, NATIONAL ACCOUNTS AND FEDERAL GOV'T SALES AREAS BASED ON NUMEROUS DIFFERENT TYPES OF ALLOCATIONS WITHIN MCI.


EXCEPTIONS TO THIS ARE BILLS TO BET FOR INFORUM AND GOV'T SALES. NOT ALL COST POOLS GET ALLOCATED TO THESE DIVISIONS. FURTHER DESCRIBED ON WP 50- $2, p \cdot 314$
2) THE ACTUAL PEMISES SAIES , WHICH IS THE MAJORITY OF COST IS ACCUMULATED IN ITS OWN COST POOL FOR EACH STATE.
3) THE SAMPLE SELECTION METHOD IS USED TO DETBRMINE REG AND NONREG HOURS FOR EACH MONTH FOR EACH STATR. 50-3
4) THE TOTAI DOLLARS ACCUMULTED IN THE PREMISES SALES COST POOLS FOR Support or Aerial BCI COSTS AND PREMISES SALES COSTS ARE THEN ALLOCATED TO REG AND NON REG FOR EACH STATE BASED UPON THE HOURS IN THE SAMPLE SELECTION METHOD.

THE TOTAL COSTS ALLOCATED FROM BC TO ALI NINE STATES, BIN BIS, DATEERV, MCCA, BEAN, BSMOB DATA, BE FOR 1992 WERE $\$ 258.470,525$. THIS INCLUDES RETURN ON INVESTMENT. SEE WP NO 50-1/3. $~+$

OF THAT AMOUNT \$210,218,285 WAS BILLED TO BET: THAT IS $81.33 \%$ OF THE TOTAL COSTS. OF THE $\$ 210,218,285, \$ 205,012,106$ IS ALLOCATED PER BCI TO REGULATED. THAT IS 79.32\% OF THE TOTAL BILLED TO ALL COMPANIES; OR $97.52 \%$ OF THE AMOUNT BILLED TO EST. WP NO $50-1 / 3 \cdot \frac{\frac{50-2}{2-1}}{\frac{2}{3}}$
THE ISSUES HERE ARE:

ARE THE ALLOCATIONS WITHIN BCI FROM THE TOP DOWN TO THE FINAL COST POOL BEFORE
 IS THE SAMPLE SELECTION METHOD OF DETERMINING REG AND NONREG HOURS FOR EACH MONTH FOR EACH STATE A REASONABLE BASIS TO ALLOCATE THE DOLLARS ACCUMULATED TO REG AND NONREG? Comelugen in 50-3

THE RETURN ON INVESTMENT IS ADDRESSED IN 50-8.

## CONFHDEMTML

(WITHIN THE ALLOCATIONS ARE ALLOCATIONS TO BBS AND BBS ALLOCATED A CERTAIN PART BACK TO BCI AND THE REST TO DS, BCS, FINS AND BLLL.) 50-2 THE REASON FOR THIS AND THE AMOUNTS IS DISCUSSED ON WP 50- $4 \operatorname{lin}^{-}$)

The following is a detailed explanation of the allocations within BCI، 50.2 pays -

| COMPANY: | EST |
| :--- | :--- |
| TILE: | FDC AND ALLOCATIONS |
| PERIOD: | TYE 12/31/93 |
| DATE: | AUGUST 26,1993 |
| WP NO. | $50-2$ |

There are 12 divisions in BCl which eventually allocate their costs to Premise Sales, National Accounts and Federal government Sales.

This premises sales, National Accounts Sales, Federal Government sales are billed to BST, BSE, BCS and DS for marketing services.

The divisions are:
BCI President rc.P0000000 Provides oversight for BCI
Allocated to live divisions based on ratio of 3 months average of
salary and wages. See $\frac{50-2}{3}$ for caloulithen of 3 ms arg.
BCI VP admin and sales
AC POAOOOOO
Provides management oversight for BBS, and divisions in BCI.
Allocated to two divisions plus BBS based on quarterly time report


RC P0a03000.
Provides finance and adm function for BBS andBCI. Allocated to BBS,
Gov'I Compliance sales operations, premises sales, and small business

Gov't complance P0A04000 General Allocator. Sent a separte bill for this each
month to BSE, DS, BST, and BCS. So the divisions that get allocated Into this before billed to BST are Pres, Finance, Hr, and Planning Directly, Premises sales, etc, and small business stragegy directly. The divisions that are allocated indirectly are Pres, VPAdmin and Sales.

The Sales Operations Adm are alocated to Inforum, Data, Intergrated Sales, ASR, Regulated, and CPE. RCPOB00000
These allocations are based on ratio three month average of salary and
wage of each group. See $\frac{50-2}{3}$ for cube 57 avenge
The Sales Operations Support are allocated to the same as the sales Operations plus to thfPremises Sales, etc. based on ratios ouphe 3 month average of satay and wage of each group. Set $\frac{50 \cdot 2}{3}$ yon cher o dang
POBO1O POBO200O POB03000

The Inforum division POBO9000 is billed at that point directly to BST, BSE BCS, and DS.

So the only direct allocation in the inform is POBo9000. Indirect allocations are from Sales Operations Support, Sales Operations, Adm, Premises Sales, Gov't compliance, Finance, HR and Planning, VP admin Sales and Pres.

| COMPANY: | EST |
| :--- | :--- |
| TITLE: | FDC AND ALLOCATIONS |
| PERIOD: | TYE 1231/93 |
| DATE: | AUGUST 26,1993 |
| WP NO. | $50-2$ |

50-2


The data Integrated sales are allocated to the Premises Sales, based on method of premises sales. POBO6000. The direct allocations to the data integrated is the sales Operating. Indirect allocations are from sales operations suppon Gov't compliance, fInance, vpadmin, and pres.

The ASR POBO8000 are allocate to premises Sales, etc based on the 3 month average of the commisions paid by each state in each of the organizations. Direct allocations are firm SalesOperations, adm, Indirect allocations are the same as data integrated sales.

The Regulated PoBo3000 is allocated to Premises Sales, etc. based onratlos of the 3 month average of time reported as BSE regulated hours. The direct and indirect allocations rethe same as ASR, Inforum and Data/ Integrated.


The CPE PoBo7000 is allocated to Premises Sales, etc, based on a ratio of the 3 month avedrage orfime reported Th BST regulated hours.
Thadicoct-andiodicoct didisionsilgfinesale-as-xogulated.
Finally, the Premises Sales, National Accounts, Federal Gov't Sales are billed to BST, BSE, BSC and DS. These are allocated to BCl customers based on the threes month average of sales productive hours ats reported by the time staffing syhstem. The ddillares in the account artie actual sales functions for the BCI customers. Every division appears to get alocated to premises sales except for gov't compliance bills, and inforum bliss.

Find out under whatRC are the Premises Sales, Natinal Accounts, Federal Gov't Sales.
Prenianis Vier $\beta$ sol
POCO-al/ms
Poor - 1 A
PoE GA
Polo Nd/sc
POGO TNIKY
POHOFL
Fed Gout Jobs)
RIAl
PlAN



## Selection of sample.

To deteraine the cost pools to sample, staff selected the matarial cost pools that are allocatad within BCi based on their allocation process. . also, staff selectd sona sualler cost pools because of the type of charges In the pools. This was deterained by the chart of accounts.

Staff also sclected the presises sales cost poul that isallocated based on the sample selection dane by intervieu. See up no 5 . For explanation. Florida was selected so that we could agree the back up uith the final information for allocation to reg/ non reg bosed on the sample.
up 50-7 contains the sample.




## Details On Cost Allocation

Step 1-BCI Executive - Executive oversight for BCI . Includes salary, other directs, and other corp. level expenses.
-Allocated to VP Adm. \& Sales, Adm. Staff, Sales Support Staff, Gov't Compliance, \& Premises Sales.
-Allocations based on a ratio of the 3 mth average of salary and wages.
Step 2-VP Adm. \& Sales - Provides mgt oversight BBS adm, BCI Finance and Adm, and Sales Support. Includes salary, other directs, and allocation from BCI Executive (Step 1).
-Allocated to BBS, Finance \& Adm Staff, and Sales Support Staff based on quarterly time reporting.

Step 3-Finance \& Adm - Provides finance and adm function for BBS and BCI. Includes directs and allocation from VP Adm \& Sales (Step 2).
-Split between $B B S$ and $B C I$, based on quarterly time reporting.
Step 4-BBS Executive - Executive oversight for BBS and all of its subsidiaries. Direct cost of President, allocation from VP Adm \& Sales (Step 2), and allocation from Finance \& Adm (Step 3).
-Allocated to BBS subsidiaries.
-Amount to BCS, DS, \& BSFINS billed on a monthly basis, one month in arrears.
-Amount for BCI is allocated to Gov't Compliance, Sales Support Staff, Line Sales Groups, and Small Business Strategy, based on a ratio of the 3 mth average of salary and wage of each group.

Step 5-BCI portion of Finance \& Adm - Amount is allocated to Gov't Compliance, Sales Support Staff, Line Sales Groups, and Smail Business Strategy, based on a ratio of the 3 mth average of salary and wage of each group.

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Step 6-Gov't Compliance- Provide assurance of BellSouth's compliance with standards of conduct in dealing with government bodies. Includes direct cost, allocation from BCI Executive (Step 1), BBS Executive (Step 4), and Finance \& Adm (Step 5).
-Allocated to BST, BCS, DS \& BSE based on the general allocator.
-Billed to each customer one mth in arrears.

Step 7 - Small Business Strategy - Provides the development of communications strategies for small business customers of BST. Includes direct cost, allocation from BBS Executive (Step 4), and Finance \& Adm (Step 5).
-Allocated to each of the line sales groups based on a ratio of the 3 mth average of hours reported by each group to BST.

Step 8 - Sales Support Administration- Operates as a support function to the sales organization. Includes cost related to the entire Sales Support Group (rents, benefits, etc.), allocation from BCI Exec (Step 1), allocation from VP Adm \& Sales (Step 2), and allocation from Finance \& Adm (Step 5).
-Allocated to the specific sales support organizations based on the ratio of the 3 mth average of salary and wage of each group.

Step 9-Sales Ops Support Only-Provides various types of support (comp adm, mechanization, results, etc.). Includes the direct cost, and allocation from Sales Ops Adm (benefits, rent, etc.) (Step 8).
-Allocated to Line Sales Group and the other sales Ops organization, based on the ratio of the 3 mth average of salary and wage of each group.

Step 10 - Inforum-Provides Corp. capabilities, marketing, and demo center. Includes direct cost, allocation from Sales Ops Adm (Step 8), and Sales Ops Support (Step 9).
-Allocated to BST, BSE, BCS, and DS based on the marketing allocator. -Billed to each customer one mth in arrears.

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Step 11 - Data/Integrated Sales - Provides data and integrated networks solutions sales. Includes direct cost, allocation from Sales Ops Adm (Step 8), and Sales Ops Support (Step 9).
-This cost pool is billed on a monthly basis to BCI customers in accordance with methods as outlined under premises sales.

Step 12 - ASR Group - Provides management of the BST Authorized Sales Rep Program. Includes direct cost, allocation from Sales Ops Adm (Step 8), and Sales Ops Support (Step 9).
-This cost pool is allocated to the premises sales organizations based o a ratio of the 3 mth average of ASR commission paid by state in each of the organizations.

Step 13-Regulated Sales Support - Provides expert support to the line sales groups related to BST network regulated products. Includes direct cost, allocation from Sales Ops Adm (Step 8), and Sales Ops Support (Step 9).
-This cost pool is allocated to the line sales organizations based on a ratio of the 3 mth average of time reported as BST regulated hours.

Step 14 - CPE Sales Support- Provides expert support to the line sales groups related to BCS products. Includes direct cost, allocation from Sales Ops Adm (Step 8), and Sales Ops Support (Step 9).
-This cost pool is allocated to the line sales organizations based on a ratio of the 3 mth average of time reported as BCS hours.

Step 15 - Line Sales Organizations - Provide the actual sales functions for the BCI customers. Includes direct cost, allocations from the support organizations as identified above.
-Allocated to BCI customers based on the three inth average of sales productive hours as reported by the time sampling system.

Notice


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Source: Copory Progened


 FDC AND ALLOCATIONS TVE 12/31/93 AUGUST 20, 1803 汉 $50-2 / 2$
AFTER ALLOCATION
FC CODE DESCAUPTION

| DIRECT | ADM | GEN MGMT TOTAL |
| :--- | :--- | :--- |
| EXPENSES | EXPENSES | FEES |



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Southern Bell Tel. \& Tel. Co. FPSC Docket No. 920260-TL
Audit
Date: 08/31/93
Item No. 2-122.10
Page 1 of 1
Request: When adding up the tracking report before allocation by RC Code for May 1992 the total does not agree with the total of the front sheet supplied in 2-126, Attachment 1. The front sheet is center 9999. Attached is my addition by RC Code for your information. Please reconcile. This addition is sent under separate cover since it comes from ESPI information.

Response: Reconciliation of before allocation is being sent in the overnight mail on September 15, 1993.

# RECEIVED <br> SEP 171993 

Forida Public Service Comm.
Miami, Florida


Date Provided: September 15; 1993



Request: Re BCI: When adding up the tracking report after allocation by RC Code for May 1992 the total does not agree with the total on the front sheet supplied in 2-126. The front sheet is center 9999. Attached is my addition by RC Code for your information. please reconcile. This addition is sent under separate cover since it comes from ESPI information. Company already has this reconciliation as part of 2-122.10. This time asking for reconciliation for tracking report after allocation.

Response: The reconciliation of the tracking report after allocation by RC code for May 1992 is being sent in the overnight mail on September 16, 1993.

# RECEIVED 

SEP 171993

Item No. 2-122.11 Attachment .



Request: Re $B C I:$ When adding up the tracking report after allocation by RC Code for May 1992 the total does not agree with the total on the front sheet supplied in 2-126. The front sheet is center 9999. Attached is my addition by RC Code for your information. please reconcile. This addition is sent under separate cover mince it comes from espy information. company already has this reconciliation as part of 2-122.10. This time asking tor reconciliation for tracking report after allocation.

Response: The reconciliation of the tracking report after allocation by RC code for May 1992 is being sent in the overnight mail on September 16, 2993.

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COMPANY:

TITLE: PERIOD:
DATE: AUDITOR:

WP No.
SOURCE: BCI 1992 BILLING SUMMARY
analysis of dollars to each state TYE 12/31/92 SEPT 24, 1993 KY
50 So .2 Source:
total billing from bi to all affiliates
258,470,525
total billing to best reg and nonreg
\% billed to best reg and non reg for marketing
total billing from bit to all affiliates Tot REG BILLING TO BST MARKETING

## CONRTREMTM





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# SPECIFIED COMRIUENTAL 


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BELISOUTH COMMNCATONS: NC.
CALCUATIONOF REG. CPE, MD ASA BY SVF
ALOCATOR FOR $100 \%$ RES 4 CPE COST POOLS
 3 MTHAVERAGEAS OF 4/30/02 FACTORS. WHENCORRECT NFO IS RECO TT THS ALOCATON WLL BE REVEWED FOA DFFERENCE IF ACTUNL AVEPAGE HND BEENUSED.

| Eviny | POC | PCO | POE | Pof | POO | Por | $p 1 A$ | $\overline{P 9 A}$ $\pi$ | $\begin{aligned} & \text { P1A } \\ & \text { MNA } \end{aligned}$ | P1A | P1A1\&2 | P0806 | TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |


| REQUNTED |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| QST-REG-R | 549.08 | 0.00 | 0.00 | 0.00 | 1.11 | 0.00 | 14.53 | 14.05 | 29.72 | 19.43 | 81.45 | 14.25 |  |
| BSTREGR. | 3.58 | 0.00 | 3.99 | 0.00 | 4.10 | 1757.70 | 147.60 | 148.81 | 135.68 | 144.03 | 38.59 | 1.25 |  |
| QST-REC-GA | 6.34 | 0.00 | 1646.01 | 6.48 | 1.79 | 0.00 | 248.39 | 236.24 | 291.88 | 258.94 | 34.33 | 2.42 |  |
| EST-PEGKY | 1.59 | 0.00 | 0.00 | 0.00 | 331.88 | 0.00 | 30.24 | 9.92 | 21.56 | 20.57 | 23.52 | 11.17 |  |
| ESt-REGUA | 1.83 | 812.50 | 0.00 | 0.00 | 2.05 | 4.59 | 32.27 | 10.61 | 30.78 | 26.55 | 42.26 | 0.17 |  |
| BSTAEGMS | 281.84 | 0.00 | 0.00 | 0.00 | 1.62 | 0.00 | 11.45 | 12.11 | 21.08 | 14.88 | 29.21 | 4.67 |  |
| ESTPRGAC | 0.00 | 0.00 | 0.00 | 1087.82 | 0.77 | 0.00 | 82.67 | 86.39 | 100.52 | 89.86 | 17.58 | 0.17 |  |
| BSTAESSC | 0.00 | 0.00 | 0.00 | 597.06 | 1.70 | 0.00 | 15.49 | 20.11 | 18.22 | 17.94 | 18.24 | 0.17 |  |
| QST PEG-TN | 1.75 | 0.00 | 0.00 | 0.00 | 940.47 | 0.00 | 95.57 | 96.65 | 113.80 | 102.01 | 47.64 | 14.68 |  |
|  | 845,90 | 812.50 | 1050.00 | 1671.36 | 1285.49 | 1762.29 | 678.29 | 640.88 | 783.25 | 694.11 | 332.82 | 48.93 | 9103.49 |
|  | 9.29\% | 0.93\% | 18.12\% | 18.36\% | 14.12\%. | 12,36\% |  |  |  | 7.62\% | 3.68\% | 0.54\% | 100.00\% |
| CFE |  |  |  |  |  |  |  |  |  |  |  |  |  |
| BCSOUTOFREGON | 0.42 | 0.00 | 0.00 | 0.00 | 1.86 | 4.83 | 59.98 | 59.86 | 75.34 | 65.06 | 0.00 | 0.00 |  |
| BCSNCHPREG-NAEGIONAL | 109.02 | 0.00 | 1.02 | 0.00 | 0.00 | 0.00 | 0.24 | 0.37 | 0.60 | 0.43 | 6.33 | 0.83 |  |
| BCSNONPEG-NREGIONFL | 3.52 | 0.00 | 0.00 | 0.00 | 0.75 | 438.33 | 12.85 | 11.00 | 13.00 | 12.28 | 25.66 | 0.00 |  |
| BCSNONAEG-N PECIONGA | 0.64 | 0.00 | 309.90 | 0.00 | 0.56 | 0.00 | 23.27 | 23.51 | 27.84 | 24.87 | 1.67 | 1.67 |  |
| BCSMONREG-N PEGICNKY | 0.42 | 0.00 | 0.00 | 0.00 | 77.60 | 0.00 | 11.71 | 2.67 | 10.99 | 8.46 | 1.84 | 2.66 |  |
| BCSNONPEGNREGONLA | 1.06 | 117.57 | 0.00 | 0.00 | 0.19 | 5.88 | 3.57 | 2.40 | 2.67 | 2.88 | 0.08 | 0.00 |  |
| BCSNOWPEGNRESCNHS | 79.50 | 0.00 | 0.00 | 0.00 | 0.75 | 0.00 | 0.41 | 2.43 | 1.91 | 1.58 | 1.34 | 1.50 |  |
| BCSNCNFEG-N PEGCNHC | 0.00 | 0.00 | 0.00 | 198.65 | 0.00 | 0.00 | 21.17 | 16.93 | 20.84 | 19.64 | 0.00 | 0.00 |  |
| BCSNONREG-NREGINSC | 0.00 | 0.00 | 0.00 | 103.71 | 0.00 | 0.00 | 8.07 | 7.97 | 2.28 | 6.11 - | 0.00 | 0.00 |  |
| BCSACNHEG.N PEGICNTN | 0.42 | 0.00 | 0.00 | 0.00 | 214.40 | 0.00 | 13.81 | 13.47 | 12.58 | 13.29 | 1.50 | 2.93 |  |
|  | 235,00 | 117.57 | 310.92 | 300.36 | 206.17 | 440.04 | 155.08 | 140.81 | 188.13 | 154.61 | 38.42 | 9.59 | 193168 |
|  | 13.20\% | 6.00\% | 18.10\% | 15.53\% | 15.33\%. | 23.25\% |  |  |  | 8.00\% | 1.99\% | $0.50 \%$ | 100.4 |

- 

$\qquad$

| STATE | FP | NES | $\begin{aligned} & \hline \text { Fig } \\ & \text { R } \end{aligned}$ | NEES |  | $\begin{gathered} \text { MAVAPA } \\ \text { FGG } \end{gathered}$ | NREB |  | $\begin{aligned} & 3 \text { MTHAVG } \\ & \text { REGS } \end{aligned}$ | \% | NBEGS | $\%$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| AL | 0 | 0 | 156,450 |  | 0 | 355.586 |  | 0 | 512.036 | 10.14\% | 0 | 0.00\% |
| MS | 0 | 0 | 05.221 |  | 0 | 142,061 |  | 0 | 237,282 | 4.70\% | 0 | 0.00\% |
| La | 0 | 0 | 582,198 |  | 0 | 619,019 |  | 0 | 1.201.217 | 23.80\% | 0 | 0.00\% |
| GA | 0 | 0 | 320.007 |  | 0 | 563.231 |  | 0 | 883.238 | 17.50\% | 0 | 0.00\% |
| N0 | 0 | 0 | 78.112 |  | 0 | 101,102 |  | 0 | 179,214. | 3.55\% | 0 | 0.00\% |
| Sc | 0 | 0 | 128,374 |  | 0 | 210.474 |  | 0 | 344,848 | 8.83\% | 0 | 0.00\% |
| K ${ }^{\prime}$ | 0 | 0 | 24.128 |  | 0 | 48,463 |  | 0 | 72,589 | \$.44\% | 0 | 0.00\% |
| TN | 0 | 0 | 82.476 |  | 0 | 202.905 |  | 0 | 205,381 | 5.85\% | 0 | 0.00\% |
| R. | 0 | 0 | 444.622 |  | 0 | 888.856 |  | 0 | 1,331,478 | 26.38\% | 0 | 0.00\% |
| TOTAL | 01 | 01 | 1,911.586 |  | $0]$ | 3.135.6971 |  | 0 | 5,047.2831 | 1.001 | 0) | 0.00 |

$=$

COMEINED TOTAL
1.00



COMPANY:
TITLE: PERIOD: DATE: WP NO.

EST
fob and allocations
TYE 12/31/93 AUGUST 26, 1993


$$
:
$$

explanation of allocations of bel costs that are not premises sales, NATIONAL ACCOUNTS AND FEDERAL GOVT SALES.
s.1

WP 50-2\% page 1 first shows the cost pool input by RC code for each RC that is to be allocated based on 3 months average of wages. see Item a.

$$
\begin{equation*}
3-1 \tag{11}
\end{equation*}
$$

wp 50-2 $h$ Hem b columns 1,2 and 3 show the wages for the states premise sales, national accounts and gov's sales at a three month average.

Columns 5 is the \% of each states premises sates, national sales and gov't sales. The total salaries in this category is item c. $\$ 10,446,218$. A ratio of each part to the whole is taken to come up with the \% in column 6 (Jobson) Then Jobson's costs are allocated to the states, national accounts and oov't by these \% For example, jobson costs in Item a are $\$ 2,209,975$. According the the org chart in wp 50-2 I I Jobsons costs are allocated to divisions. The $\%$ in column six reflect each division. For Alabama, Miss the \% is .109768. Applied to Jobson's cost center of $\$ 2,209,975$, the amount allocated to Alabama, Miss is 242,584. This is in page 3 of wp 50-2n.
The theory is the same for all these Hems on page 1 of 50-2 3.1
The theory and recalculation were done for Jobson, Sparrow, Reddersen, Bussington Incremental and Marketing Support. These are the majority of the amounts allocated

METHODOLOGY INVESTIGATED


Approx $85 \%$ of the charges allocated by 3 month average wages were audited for methodology.

Hems d on page isere were not invesilgated for methodology These are the cost pools that are allocated based on direct reg and dereg hours, plus commission paid at the state level to agents. This allocation methodology is on page 4. This are part of the $15.19 \%$ not reviewed for methodology. $\frac{50: 2}{3-1}$


| COMPANY: | BCI |
| :--- | :--- |
| TITLB: | ALLOCATIONS TO BBS EROM BCI AND CHARGES/BACK |
|  | TO BCI FRON BBS |
|  | ALLOCATION TO BCI EROM BST AND BSC. |
| PERIOD: | TYE 12/31/92 |
| DATB: | SEPT 27, 193 |
| AUDITOR: | RKY |
|  |  |
| WP NO | $50-2 / 4$ |

ALLOCATIONS TO BBS FROM BCI AND CHARGES BACK TO BCI FRON BBS

As explained in the interview with BCI people, there are no employees in BBS, BCI employees provide staff. All the executives in BBS are paid out of corp and are billed to BBS subs. The execs the assigned to BBS.

Part of the alloction process within BCI is allocating dollars to BBS the parent of BCI and then allocating part of these dollars back to BCI and part to BBS other subs, which are DS, BCS, and FINS. 50-2/1

In the BCI scenario, the cost pools that are indirectiy allocated to BBS are the BCI Pres, P0000000, which is based on a three month average salaries and wages, 50-2/1.

The cost pools that are directly allocatd to BBS are BCI VP admin and sales operations P0a000000, based on quarterly estimates. and Finance, Human Resources and Planning POA01000, POA02000, and POAO3000. These are based on either quarterly salaries and three month average of salaries and wages. 50-2/1.

BBS then allocates back to their four subs as mentioned above. The anounts that are allocated back to BCI are then allocated, based on three month average of salarles and wages in three different cost pools, to Government Compalince Cost pool, Sales operation Adm cost pool and Premises Sales, National accounts, federal Gov't sales.

The amounts BBS bills to BCI and other subs for support follow this discussion. The total amount for the year to BCI is 1,120,655. Per anser to 2-125.D, these are called oversight support services by BBC. These include executive, finance, human rsources, and planning functions.

As this was analyzed late in the audit, and the amount for the year is $\$ 1,120,655$; that is less than $1 / 2 \%$ of the total billing to all affiliates by BCI, staff did not follow up on how these oversight services were difference thranthose berwiges proxided-within-BCi. $1,120,655 / 258,470,525$. 50.1
follow up req pending $2-125$.d.i.


COMPANY:
CI
TITLE:

PERIOD:
DATE:
AUDITOR:
WP NO KY

ALLOCATIONS TO BBS FROM BCI AND CHARGES BACK TO BCD FROM BBS ALLOCATION TO SCI FROM BET AND BSC. TYE 12/31/92 SEPT 27, 193

50-2/4

ALLOCATION TO BCI FROM BET AND BC.
According to the the answer to 2-125. A. BSC AND BST bills BCI a management fee. In 1992 the management fee to BCI from BSC was $\$ 3,797,158$ and from BST was 907,007.50. As explained in 2-125.C, BST performs several corporate support functions for BBs and 1 ts s subs. The ge include internal audit, legal, human resources, and general corporate services, as well as treasure f and accounting support services.

The amounts billed by BSC to BBS are related to thegenfal corporate services performed bY BSC for all of the Bellsouth Comapnies.
request
(According to the answer to 2-125.A. BSC and BST bills all four BBS subs (including BCI) fees for the year. Do the amounts that are enumerated on 2-125. A Attachment $I$, that are Billed to BCI from BSC and ESt go into making up the FDC that is billed back to BCI?

Explain how the Human Resources from BST differes from the Human Resources at BBS and Human Resources at BCI. Explain how the Account in Support Services at BST differs from the Finance at BBS and BCI, Explain how the General corp Services at BST and BSC differs form the Planning at BBS and BCI.

These requests are answered m up $\frac{50-2}{4-4}$


| COMPANY: | BCI |
| :--- | :--- |
| TITLE: | ALLOCATIONS TO BBS EROM BCI AND CHARGES BACK |
|  | TO BCI FROM BBS |
|  | ALLOCATION TO BCI FROM BST AND BSC, |
| PERIOD: | TYE 12/31/92 |
| DATE: | SBPT 27, 193 |
| AUDITOR: | RKY |
|  |  |
| WP NO | $50-2 / 4$ |

## BCI PROJECT BILLING

PER ANSWER TO 2-124 A. BCI DOES NOT PROVIDE ANY SERVICES ON PROJECT BILLING BASES. BCI ACTS AS A CLEARING HOUSE FOR CHARGES TO OTHER BBS SUBS FROM BST AND BSC FOR CERTAIN PORJECVBILLS AND MANAGBMENT EBES. IT THEN BILLS THESE ON A FLOW THRU BASIS.

I asked the BCI people at our meeting to show me how these are flowed thru and not part of FDC. The BCI rep gave an example and saif BSC provided tax service for all subs. BSC bils BBS companies, so BCI people have to handle the bill. The entry on the books is a Payable and a Recelvable. Don't see direct expense.

Due to time restraints, PSC staff did not follow up on this part of the BCI activities.




May-92 STUHRENBERG POB0600

| ENITIY | DIRECT | INDRECT | COMBINED | \% TOTAL | DOLLARS | GRAND TOT STATE | Ra |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DAT | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSE | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSAN | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BIS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| MOEC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| RAM | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-AL | 16.58 | 1.76 | 18:34 | 0.1281 | \$ 72.503 .98 | 0.048061673 | \$73,160.84 |
| BSTREG+l. | 37.50 | 3.98 | 41.48 | 0.2897 | \$163,986.69 | 0.034477274 | \$165,472.35 |
| BST-REG-GA | 12.76 | 2.58 | 15.34 | 0.1071 | \$60,636.63 | 0.017504203 | \$61,185.98 |
| BSTfEGKY | 0.17 | 0.02 | 0.19 | 0.0013 | \$743.41 | 0.001131703 | \$750.15 |
| BST-REG-LA | 0.17 | 0.02 | 0.19 | 0.0013 | \$743.41 | 0.000454362 | \$750.14 |
| BST-REG-MS | 4.67 | 0.50 | 5.17 | 0.0361 | \$20,421.81 | 0.027150535 | \$20,606.83 |
| BSTREG-NC | 0.42 | 0.04 | 0.46 | 0.0032 | \$1,836.65 | 0.000860325 | \$1,853.29 |
| BSTPEGSC | 6.00 | 0.64 | 6.64 | 0.0463 | \$26,237.87 | 0.022691775 | \$26,475.58 |
| BST-REG-TN | 21.75 | 2.31 | 24.06 | 0.1680 | \$95,112.28 | 0.048925392 | \$95,973.97 |
| BST-NON-REG-AL | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-FL | 0.17 | 0.01 | 0.18 | 0.0013 | \$726.96 | 0.007785477 | \$733.55 |
| BST-NON-REG-GA | 7.33 | 1.34 | 8.67 | 0.0605 | \$34,110.85 | 0.248108480 | \$34,419.87 |
| BST-NONAEG-KY | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-LA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0:00 | 0.000000000 | \$0.00 |
| BST-NONREG-MS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NONREG-NC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSTNON-REGSC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-TN | $\begin{aligned} & 0.17 \\ & h^{2} \end{aligned}$ | $\underbrace{0.01}$ | $\begin{gathered} 0.18 \\ 0 \end{gathered}$ | $0.0013$ | $\$ 726.96$ | $0.009170839$ | $\$ 733.54$ $1$ |
| BCS-OUT OF REGION |  |  | $\cdots$ |  |  | 0.008409428 |  |
| BCS-NON-REG-IN REGION-AL |  |  |  |  |  | 0.010821044 |  |
| BCS-NON-REG-NREGION-7 |  |  |  |  |  | 0.021132061 |  |
| BCS-NONAEG-NREGION-GA |  |  |  |  |  | 0.040447858 |  |
| BCS-NON-REG-NREGION-KY |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-IN REGION-LA |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-PEG-N REGION-MS |  |  |  |  |  | 0.032870215 |  |
| BCS-NON-REG-N REGION-NC |  |  |  |  |  | 0.016440905 |  |
| BCS-NONFEG-N REGION-SC |  |  |  |  |  | 0.031135752 |  |
| BCS-NONREG-NREGION-TN |  |  |  |  |  | ${ }^{0} 0.056864319$ |  |
| TOTAL | 128.70 | 14.50 | 143.20 | 1.00 | \$566,\%84.25 |  | \$572,085.05 |




## LOUISTANA PODOOOOO

| LOUISTANA PODOOOOO <br> ENTITY | DRECT | IMDIRECT | COMBEMED. | \% TOTAL | DOLLARS | \% STATE TO GRAND TOT STATE | TOTAL WITH Ra |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | 1 |  |  |  |  |
| DAT | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSE | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSAN | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BIS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| MOBC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| RAM | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-AL | 0.00 | 0.00 | 0.00 | 0.0000 | * \$0.00 | 0.000000000 | \$0.00 |
| BSTREGFL | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-GA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSTREGKY | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-LA | 829.59 | 79.04 | 908.63 | 0.8689 | \$1,506,900.15 | 0.920997273 | \$1,520,552.19 |
| BSTREGMS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-NC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REGSC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-TN | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-AL | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-FL | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$ $\mathbf{\$} .00$ |
| BST-NON-REG-GA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NONHEG-KY | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-PEG-LA | 6.33 | 0.50 | 6.83 | 0.0065 | \$10,975.63 | 0.954556168 | \$11,075.00 |
| BSTNONREG-MS | 0.00 . | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSTNON-REG-NC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REGSC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-TN | $\begin{aligned} & 0.00 \\ & \mathrm{~B}^{2} \end{aligned}$ | $\begin{aligned} & 0.00 \\ & 0 \end{aligned}$ | $0.00$ | $0.0000$ <br> E |  | $0.000000000$ | $\$ 0.00$ |
| 8CSOUT OFREGION BCS-NON-REG-IN REGION-AL |  |  |  |  |  | 0.054047762 |  |
| BCS-NON-REG-IN REGION-AL |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-N REGION-R |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-N REGION-GA |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-IN REGION-LA |  |  |  | , |  | 0.000000000 | \$ |
| BCS-NON-REG-N REGION-MS |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-N REGION-NC |  |  |  |  |  | 0.000000000 |  |
| BCS-NONREG-IN REGION-SC |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-INREGION-TN |  |  |  |  |  | 0.000000000 |  |
| total | 965.69 | 80.08 | 1045.77 | 1.00 | \$1,734,730.24 |  | \$1,752,338.58 |




| $\underset{\omega}{\omega}$ | GEORGIA POECOC00 ENTITY | DRECT | INDRECT | COMBINED | \% TOTAL | DOLARS | \% STATE TO GRAND TOT STATE | $\begin{gathered} \text { TOTAL WITH } \\ \text { Pa } \\ \hline \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | DAT | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BSE | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BSAN | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | MOBC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | RAM | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-REG-AL | 0.67 | 0.00 | 0.67 | 0.0003 | ${ }^{*} \$ 1,114.26$ | 0.000738624 | \$1,124.35 |
|  | BSTREG-FL | 1.41 | 0.01 | 1. 12 | 0.0007 | \$2,344.94 | 0.000493010 | \$2,366.18 |
|  | BST-REG-GA | 1524.92 | 119.73 | 1644.65 | 0.7936 | \$2,732,910.62 | 0.788919541 | \$2,757,669.79 |
|  | BST-REGKY | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-REG-LA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-REG-MS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BSTREGNC | 3.16 | 0.01 | 3.17 | 0.0015 | \$5,255.33 | 0.002461708 | \$5,302.94 |
|  | BSTREGSC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-REG-TN | 0.83 | 0.00 | 0.83 | 0.0004 | \$1,380.36 | 0.000710052 | \$1,392.87 |
|  | BST-NON-REG-AL | 0.17 | 0.00 | 0.17 | 0.0001 | \$279.50 | 0.008627598 | \$282.03 |
|  | BST-NON-REG-r | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-NON-REG-GA | 51.92 | 4.79 | 56.71 | 0.0274 | \$91,556.77 | 0.665941422 | \$92,386.21 |
|  | BST-NONREG-KY | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-NON-REG-LA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | - \$0.00 |
|  | BST-NON-REG-MS | 0.00 . | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-NON-REG-NC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-NON-REG-SC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
|  | BST-NON-REG.TN <br> BCSOUT OF REGION | $0.00$ | $\begin{aligned} & 0.00 \\ & 6 \end{aligned}$ | $\stackrel{0}{\theta}^{0.00}$ | 0.0000 <br> 12. |  | $\begin{aligned} & 0.000000000 \\ & 0.000000000 \end{aligned}$ |  |
|  | BCS-NON-REG-NTREGION-AL |  |  |  |  |  | 0.032552468 |  |
|  | BCS-NON-REG-N REGION--L |  |  |  |  |  | 0.003937612 |  |
|  | BCS-NONREG-NREGION-GA |  |  |  |  | \$ | 0.895550188 | \$ |
|  | BCS-NONREG-N REGION-KY |  |  |  |  |  | 0.000000000 |  |
|  | BCS-NON-REG-IN REGION-LA |  |  |  |  |  | 0.006464180 |  |
|  | BCS-MON-REG-N REGION-MS |  |  |  |  |  | 0.000000000 |  |
|  | BCS-NONREG-N REGION-NC |  |  |  |  |  | 0.000000000 |  |
|  | BCS-NONREG-IN REGION-SC |  |  |  |  |  | 0.007265757 |  |
|  | BCS-NON-REG-NREGION-TN |  |  |  |  |  | 0.003875767 |  |
| $\begin{aligned} & \text { 若 } \\ & \text { No } \end{aligned}$ | TOTAL | 1941.12 | 131.16 | 2072.28 | 1.00 | \$3,443,461.03 |  | \$3,479,968.49 |
|  |  |  |  |  |  | i |  |  |


| ENTITY | DIRECT | INDIRECT | COMBINED | \% TOTAL | DOLARS | GRAND TOT STATE | na. |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DAT | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSE | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSAN | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BIS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| MOEC | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| РAM | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-AL | 0.00 | 0.00 | $0 ; 00$ | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSTREGれ2* | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSTREG-GA | 2.58 | 0.31 | 2.89 | 0.0013 | \$4,642.67 | 0.001340217 | \$4,684.73 |
| BSTREGKY | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-REG-LA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSTREG-MS | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BSTREG-NC | 1048.32 | 137.54 | 1185.86 | 0.5531 | \$1,905,337.83 | 0.892500080 | \$1,922,599.51 |
| BSTREGSC | 576.70 | 77.19 | 653.89 | 0.3050 | \$1,053,483.83 | 0.911103594 | \$1,063,028.07 |
| BST-REG-TN | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-AL | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-FL | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| 8ST-NON-REG-GA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-KY | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-LA | 0.00 | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NONREG-MS | 0.00 . | 0.00 | 0.00 | 0.0000 | \$0.00 | 0.000000000 | \$0.00 |
| BST-NON-REG-NC | 5.59 | 0.80 | 6.39 | 0.0030 | \$10,014.60 | 0.887584663 | \$10,105.36 |
| BST-NON-REGSC | 10.42 | 1.52 | 11.94 | 0.0056 | \$18,710.99 | 0.970309881 | \$18,880.58 |
| BST-NON-REG-TN A | $0.00$ |  | $\stackrel{D}{D}^{0.00}$ | 0.0000 | $\begin{aligned} & \$ 0.00 \\ & K \end{aligned}$ | 0.000000000 | $150,00$ |
| BCS-NON-REG-IN REGION-AL |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-N REGION-FL |  | * |  |  |  | 0.000000000 |  |
| BCS-NONREG-N REGION-GA |  |  |  |  |  | 0.000924951 |  |
| BCS-NON-REG-IN REGION-KY |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-IN REGION-LA |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-N REGION-MS |  |  |  |  |  | 0.000000000 |  |
| BCS-NON-REG-N REGION-NC |  |  |  |  | 9 | 0.881630583 |  |
| BCS-NON-REG-IN REGION-SC |  |  |  |  |  | 0.904123723 |  |
| BCS-NONREG-N REGION-TN |  |  |  |  |  | 0.000000000 |  |
| TOTAL | 1894.26 | 249.95 | $2144.21{ }^{10}$ | 1.00 | \$3,4,55,507.33 |  | \$3,490,856.23. |


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May-92



May-92




Southern Bell Tel. \& Tel. Co. FPSC Docket No. 920260-TL
Audit
Date: 07/26/93
Item No. 2-125
Page 1 of 2
Request: RE: BCI: Management fee billings to BCI from BST AND BC.
RE: BCI: Management fee billing to BCI from BBS.
A. What were the total management fees billed to BBS by BSC and BST in 1992? Separate into BSC and BST.
B. What were the total management fees billed to each of the four BBS Companies in 1992 by BST and BSC. Please separate by BST and BSC and by month.
C. Please explain the reason for the management fees. What type of work is being done by BST and BSC for them to bill the four BBS Companies.
D. Does BBS bill BCI a management fee? If so, provide the amounts by month BBS bills each of its four subsidiaries for 1992. If so, explain what type of being done by BBS for them to bill their four subs.
E. Five days after providing us with the above information, provide a representative familiar with this information to answer any questions or clarify any items.

Response: A. Attachment $I$ contains the 1992 management fees billed to the BBS subsidiaries by BSC, and BST.

This material constitutes proprietary confidential business information and is being produced subject to "Notice of Intent to Request Confidential Classification."
B. Attachment $I$ reflects the total management fees billed to each of the four BBS Companies in 1992 by BST and BSC.

## resit 7\%:.

C. BST performs several corporate support functions for BBS and its subsidiaries. These include the provision of internal audit, legal, human - resources, and general corporate services, as well as treasury and accounting support services. For example the benefits administration function of the BBS subsidiaries is performed by the BST benefits organization. The fully distributed costs of providing these services are billed to each of the BBS companies.


Southern Bell Tel. \& Tel. Co. FPSC Docket No. 920260-TL
Audit
Date: 07/26/93
Item No. 2-125
Page 2 of 2
Response continued:

Cost billed to BBS for BSC corporate services are related to the general corporate services performed by BSC for all of the BellSouth companies. These services are identified in the CAM as "Services Received From BSC" since the portion of the costs allocable to BBS and its subsidiaries are first billed to BST by BSC and then flowed on to BBS and its subsidiaries_through billings from BST.
D. Yes. BBS bills each of its subsidiaries for oversight support, including executive, finance, human resources, and planning functions. These activities are performed by certain BCI employees who provide BBS staff functions, in addition to their BCI-related responsibilities. See Attachment I for 1992 by month BBS support billed to the BBS subsidiaries.

This material constitutes proprietary confidential business information and is being produced subject to a " Notice of Intent to Request Confidential Classification."
E. A representative will be available the week of August 23, 1993 to answer any questions or clarify any items.


Date Provided: August 23, 1993



SUB JCT: METHODOLOGY FOR SAMPLING PREMISES SALES HOURS

## Statement of facts:

In order to determine the products sold and the regulated and deregulated hours spent by BCI Premises Soles Representatives during a particular month, BCI uses an Interview Method. This is used instead of positive tine reporting of each marketing sales representative every day.
According to the 1992 Interview Sampling Methods and Procedures, "The 1992 Sampling method conducts field interviews with thirty-three percent of Account Managers, Account Executives, System Designers, Service Consultants, Vendor Account Coordinators, and miscellaneous Premises Marketing Bales titles on a monthly basis. These interviews are designed to capture..." the time spent by the Marketing Sales Representatives.

There are six interviewers covering the following areas:
Morth/South Carolina
Kentucky/Tennessee
Florida
Alsbana/Hississippl
Louisiana
Georgia
PSC staff interviewed Mr. Bob Jones, the interviewer for Florida, Mr. Raul Martinez, a Premises Sales Account Executive, and Ms. Dottie King, who runs the data base of alI Premises Sales personnel and the mechanized program to select the sample for interview each month. Along with that, the 1992 Interview Sampling Methods and Procedures and Internal Audit Working Papers of Marketing Tine Reporting, BCI, Praises Sales, Finance; November, 1992 ( L20-24-14-SF) were reviewed by staff. The results of these procedures are described below.

Selection of Sample

Notification of Premises Soles staff of Interview.
Mr. Jones receives a list monthly from Dottie King for the people he has to interview for the month. Mr. Jones sends out a emo to those ho intends to interview a day or two before the end of the month. He
sCI AUDIT OISLCOSURE 2
SUBJECT: METHODOLOGY FOR SAMPLING PREMISES SALES HOURS
instructs then to bring all time sheets, calendars and any supporting documentation froe the first to the month up to the date of interview. He tells that what day they will be interviewed.

The Premises Sales employees only keep documentation until the date of interview, i.e. he lets them know the first of the anent that they will bo seen that month and tells them in the same memo on what day they are scheduled for interview.

As of 1993 the interview months starts the 10th of the month to the 10th of the next month. Reports are finished before the lath of the month. In 1992 It was the fth of the month, there was no time to edit or to check possible errors.

Selection of Week to Interview Employee by Interviewer

Mr . Jones abstracts a week to be sampled when he goes to the interview, he does not let thee know in advance what week he will sample, but they do know what month will be sampled. He captures five work days and if the employees works over the weekend, captures those days.

Internal Audit findings stated that

Internal Audit stated in their workpapers that *

They also stated in their workpspars that

## Internal Audit findings

Post Audit Discussions said that other methods to achieve a more randan selection of weeks would be investigated, and that interviewers could no longer preview records.

SUbject: Methodology for sampling premises sales hours
PSC staff asked if other methods have been investigated: In answer to our request 2-127, part B, the company stated that "... in a given month, a minimum of 10 calendar days would elapse before the seven-day period sample was selected. Also, interviewers are now not allowed to begin intervieves until after the 10th workday, as compared to previous requirement of 3 rd workday." "Both these changes allowed for a more random selection of weeks by Increasing the days to be included in the population from which the sample is selected." this was done in November, 1992. This also agrees with our interview with Bob Jones where he stated that the interview month runs from the lith to the DOth of the next month for 1993.

The company said that no other options were considered or documented due to the administrative burdens.

In answer to our questions at the interview regarding how the Premises Sales Representatives plan their work, Mr. Jones stated that they do a plan at the beginning of the year, but that does not mean they adhere to that. for small businesses, he said that they project what services they think they con sell. Ho also said account executives and account managers can plan a weak in advance what they are going to do.

Mr. Raul Martinez, an account executive, confirmed that he does plan in advance. He has a farm and looks at all customers listed and is constantly reviewing this. He sees customers on a three to six month cycle. Also, at the beginning of the month, ha has a plan of who he will ser.

The Interview
There is a sample selected from each district every month.
At the interview, Nr . Jones asks what the Premises Sales
Representatives do and walks through the entire day and checks the employees documentation to see If corresponds.

Employee documentation per the Internal Audit report According to the Internal Audit,

Per Internal Audit,

Mr. Raul Martinez, en account executive told us that he keeps a daily log with his appointments, a sheet of incoming calls with who called and what was discussed. He stated that he keeps detailed documentation for the month he is going to be interviewed and other documentation all years, not as detailed.

SUBJECT: METHODOLOGY FOR SAMPLING PREMISES SALES HOURS
The interviewer, using the translation table included in the 1992
Sampling Methods and Procedures, translates the work done by the employees to codes which reflect what work was done and whether it is regulated or nonregulated.

Internal audit found that

A follow up memo from Anne Marie Sparrow, 8C1, Business Markets division doted December 14, 1992 presented corrective actions. The $\log$ prepared by the interviewer will be compared with the employee's dally documentation for consistency; and the interviewers will wake sure there is enough description on the log to know what activity was done.

Rt the end of interview, Mr. Jones adds up time to oke sure seven hours or more are in each day. Mfr. Jones keeps copy of documentation in 1993. In 1992 the individual district has it.

Mr. Jones prepares a summary report of the district and reviews this with the District Manager. He also prepares o state report and this is distributed appropriately.

There are approximately 330 -345 interviews in Florida every three months.

OPINIONS:
Selection of Sample

It appears from our interview with Dottie King, and Internal Audit report that the selection of the employees to be audited in any three month period is aude on a random basis and includes the entire universe.

Since every employee has to be selected within a three month period, those that are not selected in the first two month automatically know that they will be selected in the third month.

BCI AUDIT DISLCOSURE 2
subject: hethodotogy for sakpling premises galeg hours
Selection of Heek to Intervien Enployee by Interviewer ,
It appears that in 1993 the interviewer notifies the Preaises Sales Representatives approxiartaiy 10 days before they have to start keeping records for the manth that a week will be sampled from.

It also appears that the account nanagers and account executives can plan their work a week in advance.

Based on the way the Account Managers and Account Executives can plan their work a week in advance, it is possible that even though they do not know what week will be selected for interview, to bias the sample by planning each week in the month period a certain way.

Froe discussions with Bob Jones, the service consuitants and systens designers stepport the account managers and executives. So, their tise would probably follow accordingly.

The Intervian
Although staff has probleng with the selection technique of saaple and selection of week used for the Prasises Sales Representatives, staff believes that the consistency of having one persen, who is knowledgable and experianced, code esch employee in each district of a state will lead to reliabillty of data.

Howaver, there should be more checks and balances on the final product of one interviewer. There is always a possibiity of bias whan one person is interpreting the data.

Filling out the logs with narratives that are complete and compatible with anployees documentation is iaportant for an audit trail and should be tasted in 1993 to see if it is being done. PSC staff had planned to test this, but time Ilwits precluded us doing this.
recommendation:
There should be nore checks and balances on the final product of one interviower. As a possibility, the person interviewed, along with the District Manager should be revieving the Finsl product. Anather possiblity is using sore interviovers for each state and the interviewers olternating districts interviewed.


INTERVIEW WITH BOB JONES 9/9/93 IN ATLANTA
HOW HE GETS LIST OF EMPLOYEES TO SAMPLE AND HOW HE NOTIFIES THEM.
Bob Jones receives a list monthly from Dottie king for the people he has to interview for the month. Bob Jones sends out a memo to those he intends to interview a day or two before the end of the month. He instructs them to bring all time sheets, calendars and any supporting documentation from the first to the month up to the date of interview. He tells them what day they 411 be interviewed.

The premises sale employees only keep documentation until the date of interview, i.e. let them know the first of the month that they will be seen that month and tell them in the same memo on what day they are scheduled for interview.

As of 1993 the interview months starts the 10 th of the month to the 10th of the next month. Reports are finished before the 10 of the month. In 1992 it was the fth of the month, gave no time to edit or check possible errors.

On the 10th of the month, the data base is locked.

## WHAT HE DOBS AT INTERVIEW

Bob Jones abstracts a week to be sampled when he goes to interview, does not let them know in advance what week he will sample, but they do know what month will be sampled. He captures 5 work days and if the employees work over the weekend, capture those days.

There is a sample selected from each district every month.
At the interview, Bob Jones asks what they do and walk through the entire day and check the employees documentation to see if corresponds. Employees documentation per I/A report

| COMPANY: | BCI |
| :--- | :--- |
| TITLE: | INTERVIEW WITH BOB JONES |
|  | RE STAT SAMPLE METHODS |
| DATE: | SEPT 24, 1993 |
| PERIOD: | TYE 12/31/92 |
| AUDITOR: | RKY |
| WP NO. | $50-3$ |

A follow up memo from Anne Marie Sparrow, BCI, Business Markets division dated December 14, 1992 presented corrective actions. The log prepared by the interviewer will be compared with the employee's daily documentation for consistency; and the interviewers will make sure there is enough description on the log to know what activity was done.

At the end of interview, Bob Jones adds up time to make sure 7 hours or more are in each day. Vacation is 7-1/2 and Training is 7-/12 hours. Bob keeps copy of docusentation in 1993. In 1992 the indivicual district has it.

He prepares a summary report of district. He critiques and review with district mamager, If D.M. not availab le review with time reporting area. Areas of concern mentioned by Bob. proedures, keeping up in system. Will give these concerns to DM to streamline bottleneck.

Prepare state report as well as District Report. Send copies of all to John Deriham, Sales, VP, F1, Bill Chapman, operating mgr, Fl, and Lila Shelton, Briminghar. Then sent out schedule for next month.

Before next month, sends changes in personnel to Dottle King. He interviews approximately $2\{0-250$ in a three month period. The representative from Ga interviewes the Panhandle people, but these are included in E1 hours. The Ga interviewer sees 60 people in a three

| COMPANY: | BCI |
| :--- | :--- |
| TITTE: | INTERVIEW WITH BOB JONES |
|  | RE STAT SAMPLE METHODS |
| DATE: | SEPT 24, 1993 |
| PERIOD: | TYE 12/31/92 |
| AUDITOR: | RKY |
| WP NO. | $50-3$ |

INTERVIEW WITH BOB JONES 9/9/93 IN ATLANTA
month period, for a total of 330-345 every three months.
Types of reports.
Individual Time log compilation generates a district report, District reports are complled. Give state report to Lila Shelton in Brimingham. She takes that and generates billing. Lila Shelton bills hours by product.

JOB DESCRIPTION OF MARKETING EMPLOYEES,
1 and 2. Account manager and Exec Manager
Responsible for the same and management of accounts within their turf.
The account exec are assigned accounts that are existing do whatever necessary to handle the account. The new accounts are assigned by Sales Manager The Account Exec look at accounts in turf and make bppt to go out and talk. The BRIS Business Revenue Info System tries to balance the number of accounts in an area.

The acoounts execs are broken down by size of account. Pretty much dedicated to account. Three difference areas of account execs.

1. Major accounts, have approximately 12 accounts.
2. 13-50 large business accounts.
3. 300 general business accounts. a person who wants to hustie can make more than major.

Per Bob Jones. Dottle Kings sample selection selectes $1 / 3$ of each title each month.

Example of a major account -- System one -- Dataline Synconet, Analog lines, Network - Regulated.

Example of a large business. AAA, main HDQ in Atlanta. Local AAA offices goint to HDQ. Private people who sell for AAA.

Example of small -- Norstar Switches -- Small type PBX. Northern Telcom -- Samll business compatible with esses. Sell Essx and tie Norstar behind. Combine Network ESSX.

COMPANY:
title:

DATE:
PERIOD:
AUDITOR:
 INTERVIEW WITH BOB JONES RE STAT SAMPLE METHODS
SEPT 24, 1993
TYE 12/31/92
RKY
WP NO.
50-3

INTERVIEW WITH BOB JONES 9/9/93 IN ATLANTA
3. System Designer -- Works in support of design and what of what 1 and 2 thinking and sold.
4. Service Consultant - Implementation. Issue Serivce Order to Business office. See if lines available, check to see if issued correctly. Explain first bill to customers sometimes.

The system designer and service consultant support all the work of the account execs whether major, large or general.
5. Vendor Account Coordinator -- Work with vendores who sell to outside, suport the vendors. For example, ABC Communications - Sells sytens samll PBX (nonreg)
6. Misc
a. three service reps in Tallahassee, handle all state accounts, do everything for state accounts. The do what business offlce does.
b. DSS Data Specialist -- Computer genius - resource person. used throughout the state, hi tech person.

SELECTION OF WEEK TO INTERVIEN EMPLOYEE BY INTERVIEWER.
Bob Jones abstracts a week to be sampled when he goes to interview, does not let them know in advance what week he will sample, but they do know what month will be sampled. He captures 5 work days and if the employees work over the weekend, capture those days.

Staff reviewed Internal Audit workpapers of Marketing Time Rporting L20-24-14-SF BCI - PREMISES SALES, FINANCE; BST - MARKETING - CUSTOMER CONTACT, NOVEMBER, 1992.

32 I/A findings stated that

I/A stated in their workpapers that

|  |  |
| :--- | :--- |
| COMPANY: | BCI |
| TITLB: | INTERVIEW WITH BOB JONES |
| DATE: | RE STAT SAMPLE MEIHODS |
| PERIOD: | SEPT 24, 1993 |
| AUDITOR: | RKY 12/31/92 |
| WP NO. | $50-3$ |
| INTBRVIEW WITH BOB JONES 9/9/93 IN ATLANTA |  |
| They also stated in their workpapers that |  |

They also stated in their workpapers that

## 15 Internal Audit Eindings

Post Audit Dicussions said that other methods to achieve a more rardom selection of weeks would be investigated, and that interpiewes could no longer preview records.

PSC staff asked if other methods have been investigated. In answer to our request 2-127, part B, 50-3/2 the company stated that "... in a given month, a minimum of 10 calendar days would elapse before the seven-day period sample was selected. Also, interviewers are now not allowed to begin interviewes until after the loth workday, as compared to previous requirement of 3rd workday." "Both these changes allowed for a more random selection of weeks by increasing the days to be included in the population from which the sample is selected." This was done in November, 1992. This also agrees with our interview with Bob Jones Where he stated that the interview month runs from the 10 th to the 10 th of the next month for 1993.

The company said that no other options were considered or documented due to the administrative burdens.
$I$ asked Bob Jones if account exacs' plan who they are going to see, He said they do a plan at the beginning of the year, that does not mean they adhere to that, For small business, he said that they project what services they think they can sell. He also sald account exec's can plan a week in advance what he is going to do. They do make plans.

I requested an interview with an account manager and an account exec together or the large businesses. Not given as of Sept 22.

```
COMPANY:
BCI
TITLE: INTERVIEW WITH BOB JONES
STAT SAMPLE METHODS
SAIESMPT 24, 1993.
PERTOD:
AUDITOR:
TYB 12/31/92;
WP NO.
50-3
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INTERVIEW WITH BOB JONES 9/9/93 IN ATLANTA
PSC OPINION
CONCLUSIONS RE STAT SAMPLING METHODOLOGY

## SELECTION OF SAMPLE

It appears from our interview with Dottie King, and Internal Audits report that the selection of the employees to be audited in any three month pariod is made on a random basis and includes the entire universe.

Since every employee has to be selected within a three month period. those that are not selected in the first two month automatically know that they will be selected in the third nonth.

How will this influcence the sample?
SELECTION OF WEEK TO BE SAMPLED
It appears that the interviewer notifies the marketing employees approximately 10 days before they have to start keeping records for the month that a week will be sampled from.

It also appears that the account managers and account execs can plan their work a week in advance.

If the Account Managers and Account Execs can plan a week in advance what they are going to do, they can plan for all four weeks in the sample and there is a chance here to bias the sample.

From discussions with Bob Jones noted above, the service consultants and systems designed support the Account Managers and Execs. So, there time would probably follow accordingly.

Internal Audit in their November, 1992 audit workpapers stated that

|  |  |
| :--- | :--- |
| COMPANY: | BCI |
| TITLE: | INTERVIEW WITH BOB JONES |
|  | RE STAT SAMPLE METHODS |
| DATE: | SEPT 24, 1993 |
| PERIOD: | TYE 12/31/92 |
| AUDITOR: | RKY |
| WP NO. | $50-3$ |

INTERVIEW WITH BOB JONES 9/9/93 IN ATLANTA
Based on the way the Account. Managers and Account. Executives can plan their work a week in advance, it is possible, thet, even though they do not know what week will be selected for interview, to blas the sample by planning each week in the month period a certain way.

## THE INTERVIEW

PSC staff belleves that the consistency of having one person, who is knowledgable and experienced, code each employee in each district of a state will lead to rellability of data.

Filling oun the logs with narratives that are complete and compatible with employees documentation is important for an audit trail and should be tested in 1993 to see if it is being done. PSC staff had planned to test this, but time limits precluded us doing this.



Heretofore, all premises Marketing Sales time reporters were required to do daily documentation of their activities for twelve months of the year to provide an audit trail for Bellsouth's FCC compliance for affiliate bililng. This documentation was retained for two yearg for each individual.

Effective January-1, 1993 the Premises Marketing Sales organization will discontinue the practice of twalve-months "daily" documentation for FCC compliance. Daily documentation for account management will become an option for the local manager. Daily documentation vill be required of each time reporter scheduled for a sampling interyiev in the current month. The revised sampling procedures given below clarify the process.

Interviewers will begin interviewing after the end of the fifth work day of the current month. Until completion of the interview session, the time reporter will be required to keep detailed daily documentation. In addition to the time, this documentation will include customer name and description of the activity. The documentation for the seven-day period sampled will be retained with the mechanized log activity. Daily activity will continue to be no less than 7.0 hours per day. once the mechanized activity log is completed, explanatory notes may be required on the daily documentation to clarify the activities performed. These documents will become the complete audit trail and be retained by the interviewer for two yearm.

F0ikeay eegisu



PART X TIME REPORTING


The information contained in this section is pertinent to South Central Bell.' Southern Bell is scheduled to convert to M.T.R. Time reporting during third quarter 1990 and specific inforamtion will be issued at that tIme.

Any questions concerning Part $X$ in Southern Bell should be referred to the District Part $X$ coordinator or one of the following:

Part X Policy
Art Smith
( H (14) 529 2788
Part X Implementation Policy
Nancy Rick
(404)529-7380


## PART X REPORTING

The information contained on the following pages is designed to: ,

- answer common questions concerning reporting time
- provide examples of Par X time reporting


## Reporting Time:

It is important to understand that we are to report productive customer time. Productive Customer time is defined as any time you spend for or on behalf of a customer.

## Examples of what should be reported include:

- Account Planning for a Specific Account
- Data Gathering
- Proposal Preparation
- Proposal Presentation
- Executive Visit Contacts
- Cold Calls
- System Design
- Order Issuance
- Demand Activities
- Billing Inquiries
- Station Reviews
-. Travel Time to and from Customer's Premise
- Repair Problems
- Network Usage Studies
- Service Visits


## Examples of time we do not report include:

```
- Meetings (non-customer related)
- Vacation
-Sickness
- Holidays
- Company Functions
- Administrative Functions (non-customer related)
- Training
```



## Splitting Time:

It is important for personnel reporting time to split their time among the product codes they are working on for two reasons. First, the information reported to the individual product codes is split into regulated and non-regulated expenses for compliance with the F.C.C. Part X order. Second, and equally important. the time reported to the products is utilized internally by Southern Bell and South Central Bell to determine product profitability and pricing information. In essence, if an individual is working on multiple products and reports their total time to a single product code, we are not only misrepresenting the time spent on regulated and non-regulated activities,-but-also misrepresenting_the expenses that should actually be charged to multiple products.

In most situations, both a regulated and a non-regulated product code should be used for reporting time.
The following pages depict several specific examples of the clear division which should be evidenced through time reporting.

In most cases, time can be split between product codes in a clear manner as evidenced in the examples in this section.

In situations when the time spent by an individual working on multiple product codes is not clear, it is the responsibility of that individual to use their best judgement in splitting the time between the product codes.

Multiple lines in the activity section of the contact $\log$ are not required to report time to multiple product codes. (See chart A).

Separate entries are not required on the contact $\log$ for like functions. (See chart B).


## TIME REPORTING EXAMPLES:

## Time Spent Resolving Billing Issues "

- Any time spent resolving billing issues conceming a specific product should be reported to that product.
- For example: You spend three hours resolving the customers first bill on ESSX Service; therefore, three hours should be reported to ESSX.
- The "BILSV" product code is for reporting time to activities spent on club billing or other special billing arrangements.


## Time Spent on Wiring Issues:

- Any time spent on wiring for a customer should be reported to the "IWCOM" product code. This code does not count against CPE products, it is tracked as a deregulated network product.


## Time spent on P-phones:

- The time spent selling and ordering P-phones should be reported to the "PPHON" product code. Time spent doing station reviews/adds, moves and changes should be split between ESSX and P-phones as it requires work on both to make the system function.


## Account Planning:

- Small Business Account Executives should not report account planning time. (SBAE account planning is normally module planning as opposed to customer specific account planning).


## Use of "OTHER" Product Code:

- The "OTHER" product code can be used in situations where the reporting person cannot determine how to split the time between the regulated and non-regulated product codes. -For example, an Account Executive makes an executive contact with a custorner who has both BellSouth regulated and unregulated products. During the meeting, both products and services are discussed; if the Account Executive is unable to determine how to divide the time, the "OTHER" product code could be used. The time charged to this code would automatically be split in the same proportion as the total time reporied to specific product codes.
- The use the "OTHER" product code is a last resort when both regulated and non-
regulated products are involved but there is no way to deterine how to split the time between the prodqis

\author{

- Private -
}

Example 5:


#### Abstract

A Service Consultant is implementing a sale and is coordinating the appropriate orders and order documents (ESSX forms, PBX forms, sales service orders, etc.). The sale was for ESSX and ESSX CPE. The SC spends 4 hours issuing the ESSX request form and 2 hours issuing the local service order. They would report 6 hrs to ESSX. They then spend 2 hours securing financing and the contract for the CPE and 2 hours issuing the Sales Service Order for CPE and would therefore report 4 hours to CPE.


Again, because we are using two separate order systems, these situations should be easy to split.

## Example 6:

A System Designer working on integrating an SL-1 and Megalink. The time spent running SL- 1 configurations and pricing should be split between the SL- 1 product code and the "LINES" as the configuration combines both products. The or the other. In this event, your best judgement should be used to allocate time between the products.

## Example 8:

A Service Consultant is asked to conduct station reviews for the implementation of an ESSX System with BellSouth CPE. During the next two weeks the SC performs the station reviews and simultaneously determines the programming for the ESSX stations and the type of CPE for each user. If the number of ESSX stations is 500 . and BellSouth is installing 500 CPE sets, then the SC could use a 50/50 split between ESSX and CPE.

When actually issuing the ESSX request form or SSO, the actual time spent on each activity should be reported to the appropriate code. For example. if it takes two days to issue the ESSX request form and the ESSX orders, you would report 15 hours to the ESSX code. The additional time spent issuing the CPE orders should be reported to the "ES/CPE" product code.

## Example 9:

A customer calls in and requests five additional trunks to be added to his AT\&T PBX. It takes 4 hours to issue the local orders. All four hours should be reported to the "LINE" product code (there is no BellSouth CPE involved).

## Example 10:

Using the same example above with a BellSouth $\mathrm{SI}-1$, the SC would split time between the "LINE" product code and the SL-1 product code ("NTINT"). The same 4 hours would be reported to the line product code, however, if an additional hour was spent determining whether the SL-1 has adequate trunk ports to support the lines you would report that hour to the SL-1 product code.

## SALES CHANNEL/PRODUCT CODE

## GENERAL

The sales channel indicator is being added to provide historic data sorted by sales channel to be used in conjunction with the CSS cost pool. This data will be used in future planned analysis reports. Access to CSS via the information center will provide this data for performance/analysis reports requested by BellSouth Services Marketing.

In South Central Bell, a sales channel field has been added to the resource profile for hard-coding Account Executive hours to one particular sales channel where appropriate. Southern Bell has no sales channel indicator on the resource profile. In order to drive both Southern and South Central individual entries to a sales channel, the T/P indicator on the contact $\log$ is redefined. It will be a mandatory field for AE/ SC/SD/01/02 in Southern Bell. It is a mandatory field for SC/SD/01/02 in South Central.

Note: The programming changes are compatible to both Southern Bell and South Central Bell SOMS BOC applications.

## CONTACT LOG DATA FIELD CHANGE

The existing T/P (for telephone/premises contacts) data field is redefined to sort data by sales channels.

1. The heading will show S/C for sales channel.
2. The Gold L listing screen on this field will show:
3. $\mathrm{X}=$ Miscellaneous
4. $\mathbf{M}=$ Major
5. $L=$ Large
6. $\mathrm{S}=$ Small

Enter selection and hit<RETURN>.
NOTE: National Accounts should report under Major.
NOTE: Miscellaneous is not to be used at this time.

$c-1.82$
IMPORTANT!!!!!!!!!
We have also added special product codes to allow reporting of out-of-region, out-ofcompany, and intra-company/inter-state hours and codes for reporting hours associated with customer positioning, account/market qualification and base protection.

Out-of-Region, out-of-company, intra-company/inter-state special product codes, CD, CR, RD, IW, ID, IK, IP, 10, and $\mathbb{R}$ are assigned to drive indirect expenses to follow direct expenses charged to the appropriate company/installing branch levels.

These procedures will cause customer productive hours and associated expenses to be directed to the organization receiving the revenue resulting from the sales activity. This procedures works in conjunction with MTR input activities which take place concurrently. The SOMS activities ensure that the customer productive hours are directed to the proper organization and the cost separations system is provided accurate information upon which to base allocation factors. MTR activities ensure that the appropriate organizations cost pools are increased or decreased, based upon the direct assignment of activities.

- Out-of-Region and out-of-company hours will not be used in any allocation factoring in SOMS or MTR because dollars associated with this activity are sent to a direct regulated/deregulated pool that is not allocated by hours.
- Out-of-Region, out-of-company, out-of-entity hours are not included in the allocation factors and will not be included in MICAP/PPS reports' summary totals. These hours will fall out under exceptions.
- Spreadable hours are included in the MICAP/PPS reports' hour totals and summary totals.
- Intra-Company/Inter-State hours will be included in the receiving entity's allocaion factors within CSS.

Note: Inter-State indicators will be driving hours to the branch level (PG6).


On the screen below we have entered "IW" on the product code field.

SERVICES / ACTUAL HOURS

|  | PLY | LADS | LW |  |
| :--- | :---: | :---: | :---: | :---: |
| AE Name: | 000.0 | 000.0 | 000.0 | 000.0 |
| SD Name: | 000.0 | 000.0 | 000.0 | 000.0 |
| SC Name: | 000.0 | 000.0 | 000.0 | 000.0 |
| Other 1 : | 000.0 | 000.0 | 000.0 | 000.0 |
| Other : | 000.0 | 000.0 | 000.0 | 000.0 |
| Quantity | 0 | 0 | 0 | 0 |

Service Order No. 1
Service Order No. 2

| Proj. Revenue | 0 | 0 | 0 | 0 |
| :--- | :--- | :--- | :--- | :--- |
| Actual Revenue | 0 | 0 | 0 | 0 |

## SCREEN 3



Please select one of the following entries:

All validation procedures will apply to these codes.
From the contact log example above the user has entered 5BI which equates to one Marketing Manager group (responsibility code G0403) in Louisiana.

Included below is a hard copy of PG6 information to be used in reporting out-ofentity (interstate) hours.

## TABLE FOR MANAGER CODES:




## SPREADING HOURS

* Note: "Other", POSAL, ACMAL and CSVAL will be spread across all product codes by percent factors prior to sending data to CSS. Product codes CD, CR, IW, ID, IK, IP; IO, IR, and RD are excluded from this computation. No hours should be spread to these codes.
-Computation for Percent Factor:
Hours Per Product Code
-.---..------------ $=$ Percent Per Product
Total Hours
-Computation for Spreading Hours:
Total Spreadable Hours $\times$ Percent Per Product $=$ Hours Added To Product Code

Definitions:

Hours Per Product Code $=$ Total Hours reported to a product code $($ within SOMS, does not include product hours received from out-of-entity)

Total Hours = Total of all product code hours, excluding CD, CR, IW, ID, IK, IP; IO, IR, RD, "OTHER", ACMAL, CSVAL and POSAL.

Total Spreadable Hours = "OTHER", POSAL, ACMAL and CSVAL

- On the MICAP/PPS reports, hour totals will exclude hours reported to CD, DR, IW, ID, IK, IP, IO, IR and RD. These will fall our under "exceptions".
- These reports will include those types of hours ("OTHER", POSAL, ACMAL and CSVAL) which are spread across product specific codes.
- The allocation factoring in SOMS will not include our-of-entity hours within sending or receiving branches. CSS will include these hours in their allocaion factoring.





( RECEIVED CB/EH 07: 031993 AT
08-04-93 . 08:07 M


Bel18outh

1234567 PACE 2 (PAIWTLD PAEE 2) 1
P02/02

Q1. How do you find out about personnel ohanges?
Q2. How do you notify etatimtician of peraonsol changen?
Q3. Once you recaive list of maployeet tor the mopth, how do you go about soheduiling?

* Baw pretarn mach month7
* help from distriot coordinatore?
* notification of emplóyeas?
- how much notion do you givar

Q4. How do you handie requente for ohangew or aubetitutione to the chadulas?

Q5. What do you do if amploye in sot available for intexviov or
eanoele/no bown?

- Q6. How do you seleot weak of tive for inputs

Q7. What it moloye is out elok or on vacetion for that week?
$\checkmark$ Q8. Do you verify that dnformation on calendar lim same en time log?
$\checkmark$ 99. What documentation do you keap?
V010. Do you conduct telephone Intervieve?

* If mo, do you obtain copies of calandary?



TO:
FROM:
RE:
MRMOPAMDEM
SEPTEMBER 10. 1906
0: KAREN KAETZ, BST, BIRMINGHAM (2) RUTH YOUNG, FPSC,: MIAMI CONFIDENTIAL REQUESTS RE BCD.
here is a request regarding bi that I believe is confidential.
2-127.8
THE INFORMATION (HOURS) PROVIDED IN 2-126, ATTACFMENT III, FDC BILLING MODULE, MAY, 1992 DOES NOT AGREE WITH THE INFORMATION PROVIDED BY BOB JONESIN OUR INTERVIEW ON 9/9 IN THE FOLLOWING MANNER. PLEASE RECONCILE. '2-126 IS CONSIDERED CONFIDENTIAL AND THE REQUEST IS BEING SENT DIRECTLY TO KAREN KAETZ AS CONIFDENTTIAL.



## POC ALABMAMMISSISSIPPI

ay-92



May-92



## POG TENNESSEEKENTUCKY



POH FLORIDA






MorE $A=$ Soles reps in Florida also at times sell products out of Florida and these are rescued from the hours billed to 69Y florida. And the reverse is true, sales reps out of Florida sell things for florida and these hours are added in to bill BST Florida.

Wart $8=$ as explained by 8 Cl personnel, these are hours spent In trying to position a sale; customer productive than: Cannot identify particular product, not product specific.
note 81 - includes all nonspecific hours.
mote bt tokes our nonspecific hours that relate to other states.

Note $\frac{10}{\frac{50-3}{2}}$


BEGIN DATE: 03/01/92

TIME REPORT
FOR: FL
RUN DATE: 9/16/93

END DATE: 03/31/92
SUMMARY FOR FL
CUSTOMER TIME


| PROD | ADMIN WORK CODE | R | AE | SC | SD | OTHER |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CODE | DESCRIPTION | D | HRS | HRS | HRS |  |  |
| COMP | TIME SPENT ON COMPEN |  | 7.50 | 1.25 | 0.5 | O00 | 25 |
| HELP | TIME SPENT HELPING 0 |  | 0.50 | 18.25 | 210 | doo | 75 |
| MEET | MEETINGS |  | 33.50 | 37.00 | , | $0 \% 0$ | 93.25 |
| OTADM | OTHER CO. ADMINISTRA |  | 47.50 | 78.75 | 3.0 | 6.00 | 206.25 |
| PARTX | PART X TIME REPORTIN |  | $9 \times 50$ | 1.2 | 6.25 | 0.00 | 127.00 |
| PROJ | SPECIAL PROJECTS |  | 9450 | 8 | $640^{\circ}$ | 0.00 | 141.50 |
| READ | TIME SPENT READING |  | 5100 | 2.5 | 4 | 10.00 | 33.25 |
| TIME | TIME REPORT PREPAR |  | 2) -7 | 145 | -2, 25 | 0.00 | 9.50 |
| TRAIN | TRAINING CLASS |  | 5 , 5:0 | \% 67 | 34.00 | 0.00 | 187.00 |
| VOUCH | VOUCHER PREPARETION |  | $0 .$ | $10200$ | 0.00 | 0.00 | 0.50 |
| TOTALS |  |  | 211.75 | 300.00 | 220.50 | 6.00 | 738.25 |


 OF ITS SUBSIDIARIES EXCEPT UNDER WRITTEN AGREEMENT

FOR: FL
RUN DATE: 9/16/93
END DATE: 04/30/92
BEGIN DATE: 04/01/92
SUMMARY FOR FL
CUSTOMER TIME

| PROD CUSTOMER PRODUCTIVE | R | AE | SC | SD | OTHER | TOTAL |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| CODE CODE DESCRIPTION | D | HRS | HRS | HRS | HRS | HRS |  |
| $-A C M A L ~ A C C O U N T ~ M A N A G E M E N T ~$ | 0 | 0.00 | 1.00 | 0.25 | 0.00 | 1.25. |  |
| CSVAL CUSTOMER SERVICING | 0 | 2.00 | 0.00 | 0.00 | 0.00 | 2.00 |  |
| POSAL POSITIONING RID | 0 | 2.00 | 3.00 | 0.00 | 0.00 | 5.00 |  |
|  |  |  |  |  |  |  |  |
| SUBTOTAL |  |  |  |  |  |  |  |

COMBINED TOTALS . $679.75 \quad 871.50 \quad 702.75 \quad 6.50 \quad 2260.50$




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TIME REPORT
FOR: FL
RUN DATE: 6/1/92

END DATE: 05/31/92

BEGIN DATE: 05/01/92
SUMMARY FOR FL

| PROD | CUSTOMER | PRODUCTIVE | R | AE | SC | SD | OTHER | TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CODE | CODE DES | CRIPTION | D | HRS | HRS | HRS | HRS | HRS |
| ACMAL | ACCOUNT | MANAGEMENT | 0 | 7.50 | 0.00 | 13.00 | 0.00 | 20.50 |
| CSVAL | CUTOMER | SERVICING | 0 | 10.00 | 0.00 | 23.00 | 0.00 | 33.00 |
| POSAL | POSITIO | INNG R/D | 0 | 37.25 | 18.00 | 4.75 | 0.00 | 60.00 |
| SUBTOT | LAL |  |  | 54.75 | 18.00 | 40.75 | 0.00 | 113.50 |

COMBINED TOTALS $877.50 \quad 974.00 \quad 862.00 \quad 42.00 \quad 2755.50$


| PROD | ADMIN HORK CODE | R | AE | SC | SD | OTHER | TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CODE | DESCRIPTION | D | HRS | HRS | HRS | HRS | HRS |
| COMP | TIME SPENT ON COMPEN |  | 11.50 | 0.00 | 1.00 | 0.00 | 12.50 |
| HELP | TIME SPENT HELPING 0 |  | 1.50 | 12.50 | 35.75 | 0.00 | 49.75 |
| MEET | MEETINGS |  | 66.75 | 32.00 | 20.50 | 0.00 | 119.25 |
| OTADM | OTKER CO. ADMINISTRA |  | 88.00 | 92.25 | 62.75 | 0.00 | 243.00 |
| PARTX | PART X TIME REPORTIN |  | 15.00 | 20.50 | 13.50 | 0.00 | 49.00 |
| PROJ | SPECIAL PROJECTS |  | 82.50 | 48.50 | 87.00 | 0.00 | 218.00 |
| READ | TIME SPENT READING |  | 16.50 | 41.75 | 17.75 | 0.00 | 76.00 |
| TIME | TIME REPORT PREPARAT |  | 2.50 | 5.25 | 4.00 | 0.00 | 11.75 |
| TRAIN | TRAINING CLASS |  | 41.50 | 77.50 | 49.75 | 0.00 | 168.75 |
| TOTALS |  |  | 325.75 | 330.25 | 292.00 | 0.00 | 948.00 |


| $\begin{aligned} & \text { PROD } \\ & \text { CODE } \end{aligned}$ | OUT OF MARKET CODE DESCRIPTION | $\begin{aligned} & \mathbf{R} \\ & \mathbf{D} \end{aligned}$ | AE <br> HRS | SC HRS | SD <br> HRS | OTHER HRS | TOTAL HRS |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DP | EXCUSED WORKDAY |  | 0.00 | 7.50 | 0.00 | 0.00 | 7.50 |
| HO | HOLIDAY |  | 7.50 | 7.50 | 0.00 | 0.00 | 15.00 |
| ILL | ILLNESS |  | 0.00 | 4.00 | 0.00 | 0.00 | 4.00 |
| OFF | TIME OFF |  | 9.25 | 5.75 | 8.00 | 0.00 | 23.00 |
| VAC | VACATION |  | 22.00 | 26.50 | 0.00 | 0.00 | 48.50 |
| TOTAL |  |  | 38.75 | 51.25 | 8.00 | 0.00 | 98.00 |



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Faikean 0ile3i



Item Mo. 2-127.8
$\int_{\text {FLORIDA POHOOOOO }}$
 AVO Attachment $\boldsymbol{A}$
 NON FPEGNOENTITY DAT
ESE BSAN
BS BS
MOBC faw
8ST-PEG-TOTAL
BSTREGHO STATE ESTHEGAL BSTPEGFL
BSTPEG-GA ESTREGKY BSTREG-LA BSTFEGMS ESTREGNC BSTREG-SC BSTAON-SPECFIC-TOTAL OST NON-SPECAFICNO STATE BST-NON-SPECIFIC-AL ESTAONSPECIFXCץ BST-NON-SPECIFIC-CA BSTHON-SPECNFCKY BST-NON-SFECAFIC-LA EST NON-SPECFICHS BSTHON-SPECIFICAKC BST-NON-SPECIFC-SC BST-NON-SPECIFIC-TN
BST-NON-REG-TOTAL EST-NON-PEG-NO STATE ESTHONPEG-AL. BSTHON-RER-FL BSTHON-REG-GA ESTAON-REG-K EST.NON-AEGHA EST NONREGHS EST-NONREOHC ESTAONFEG.SC ESTHON-REG-TN BST TOTAL
BCSOUT OF REGKN ECSNON-REQ WN REGION TOTAL HOURS

BCS-NON AEG-N REOON NO STATE ECSNONREG-N RECION-AL BCSNONPEG.N REGIONLI BCSAON-FEOHN REGON-GA BCSAONFEO-N REGONHY BCSHON-REG-N REGIONHA BCS-NONFEG-NN REGIONHS ECSNONPEGW REGION-NC BCSHON PEG N FEGON-SC BCSAONFREG-N REGION-TN BCS TOTAL TOTAL HOUAS


Page 1




Response: BCI exists for the sole purpose of marketing the products and services of the Bell south companies. As efforts are made toward this end by the sales force, they code their time to the companies who are benefitting from their work. These companies, with the exception of BBS, are then billed based on this time reporting. As discussed in Item No. 2-078.A, the BBS line item on the Billing Summary reflects the BBS cost pool on BCI's books. The only written agreement existing between BCI and any of the above companies is with BellSouth Mobile Data. A copy of this working agreement is being sent in the overnight mail on October 13, 1993.

This material constitutes proprietary confidential business information and is being produced subject to a "Notice of Intent to Request Confidential Classification."


Date Provided: October 13, 1993


# 1993 Working Agreement Between BellSouth Commuaications, Inc. National Accounts Division and BollSouth Mobile Data 


#### Abstract

1993 Planned Activity , 1 BCI National Accounts Division's 1993 Actount Plans were examined to detectnine which accounts bad identified mobile data opportunities. Reveauc opportunitice and required mandays by account were roviewed joinlly by BCI NAD management and Mike Harrell - BellSouth Mobile Dats. The aceounts and opportunitict which BMD wanted BCI NAD to focus their marketing/sales services were selected. A total of 200 mandays was agreed upon with 28 mandays reserved for uuknown opportunities or potential overruns. BCI NAD will manage to the agreod upon time. The budgeted expense for this setivity is $\$ 160,000$. Attached is a listing by account of revenue opportunities and mandays planned for 1993.


## Compensation for BCI NAD Sales

BCI NAD employecs may be compensated for mobilo data opportunities jubich result in closed sales. The sale must be the direct result of the BCI account team's involverreat. Once a contract has been signed, the National Account Manager must initiate \& Compensation 1 djustment Voucher to certify the salc and provide the Compensation group with documentation to pay the employocs. The CAV must provide full details of the sale and be sigoed by David Scobey, VP Sales - BCI NAD and Bill Olin, VP Salcs - RAM Mobile Data. BCI; not BellSouth Mobile Data nor RAM Mobile Data, it responsible for paying the compensation amounit A blank CAV is attached.

## Billing Arrangements

BCT's accounting department issues monthly invoices for NAD's marketing/ales services. The elharges are not based on direct axpenses but fully loaded costs pronated back to tho various BellSouth affiliates which BCI NAD represente. These billback charges are calculated on a monthly basis detecrined by the time NAD employees charge to the several arfiliates.

The billhack charges associated with BellSoulh Mobile Data and RAM Mobile Data will be split into two ceparale invoicer. The charges will be prorated to invoice RAM Mobile Data for five-eights (5/8) of the monthly charges and BellSouth Moblle Data for the reraxiuing threc-eights (3/8). Invoieca will be directed to:

Jira Dalton
Sales Manager
BellSouth Mobile Data
1100 Peachtroc SL
Room 8B02
Atlenta, GA 30309-4599
(404) 249-5349
(404) $249-4343$ (Facsimule)

Bill Olis
VP-Salos


1983 Bollsouth Mobile Data Planmad Activity
 $B$ Revenue obacortuntie:

BMD
Approved Manday
Nactomut Aceolurit



| 3 | Pat Hownerd | 404682.5785 |
| :---: | :---: | :---: |
| 0 | Pet Howard | (404) 982.5768 |
| 0 | Ron Robingon | 14041 182 -8470 |
| 0 | Bil Bakar | (208) 64E-4972 |
| 20 | ETH Eakn | (20.8) 646-4972 |
| 0 | Findy Comb | (404) 982-6758 |
| 0 | Randy Cook | (404) $882-5768$ |
| 5 | Robert Spaoney | (704) 829.2543 |
| 0 | john Trumiontin | 19191 681-2004 |


| 3 | Lyman smith | (404) 682.555 F |
| :---: | :---: | :---: |
| 0 | Sushen Phola | (618) 74861340 |
| 0 | Red Lewit | (15021 428-4304 |
| 0 | Man Armi Kapajico | (404) $1822-8440$ |
| 0 | Chardie Ravions | (404) 9:22-5680 |
| 0 | Dgilah Amir | (404) 182-5695 |






INTRO

SCOPE
FURPDSE: Make sure controls over the sampling method are adequate so that the tine reported for JCO purposes is accurate.

PROCEDuRES:

```
COIPANY: 
                        L2O-24-14-A-3F
                        bCI - PremiSE Sales, fimnHCE; bST - MarkEting
                        -CUSTOHER CONTACT
                #OUEMBER 1992
AUDITQR: RKY
wo.
```


10



```
COMPANY: BST
TITLE: REUIEW OF INTERNAL. ALDITS
                                MARKETIMG TIME REPORTING
                L20-24-14-A-SF
    f BCI - FREMISE SALES, FINANCE; BST - MARKETING
                -CUSTOMER CONTACT
                "CONFIDENTIAL
WP HO.
                            ESPI
```

Post audit discussions:

Procedures would be estbilshed to provide for review of supporting documentation. the supporting infor and ina logs would be kept 2 years. Narratives would be used.


Past Audit Discussion:

1. Other hetheds to achieve more randon selection of weeks would be investigated.
2. The interviewers couid no longer preview records.
3. Establish methods to make sure that more random selection of tine occurs.
$\qquad$


UP NO. ESP

I/A suggested that

Post Audit discussions revealed that BCI Finance has already started procedures to clarify these items.
items not included in audit report but warrant management attention:

1. A minimum of 7 hours each day is not always reported.

Procedures for tine reporting say a minimum of 7 hours have to be reported. There are exceptions to the 7 hour day. These are an "Account Manager with supervisory responsibilities and for tine worked on weekends. There are no controls for this.

In the audit, it was noted that '
2. A mechanized log for recording changes made to time logs did not exist.

After the data is entered into the Tine Reporting Systan, there are a member of people who can make changes within a certain amount of days. However, there was nat achanized systems to keep track of the changes and If an authorized person ado the changes.

1/A suggested that

ME NO FROM AM ME MARIE SParrow, sSt, business Markets division.
DEEEHBER 14, 1992
CORRECTIVE ACTIONS:

1. SUPPDRIIHG DOCUMEHTAIION

The printed $\log$ prepared by the interviewer will be compared with the tine reporters dally documentation for consistency.


The interviewers will make sure that there is enough description on the $\log$ and daily documentation to know what activity was done,

The logs and enpolyees documentation will be kapt by the interviewer for two years. Copies of the logs uill be in a central location in the BCI Finance Departaent.

2 RAMDOM SELECTION OF TIME FOR REviEE
Schedules were revised to add two days to choice during first half of nonth7?7 Heed explanation.

The employees docynentation will not be previewed before time period is selected.

A revien of this randon selection process will take place first quarter, 1993 to see if changes are offective.
3. CLARIFY HISCELLANEOUS CODES

Tine reporting scenarios were published in Hevember defining the use of selected aisc codes.
hotes froh imternni aldits
Included in the workpapars were 1992 INTERUIEW SAKPLING METHBDS AND PROCEDURES. PSC AUDITORS REqUEST.

Also included is the TRANSLATION TABLE -- PSC auditors request.
PSC also request BST, MARKETIHG TIME REPGRIING -- BYSTEM DESIGN IB PAGES
Al. 80 REquEST SARKETIMG TIHE REPROTING SCREENS -- IJ PAGES
Also provido MARKETING TIHE REPORTIMG, HEM EMPLOYEE INFORHATIOM.
Also request PART X TIME REPORTIHG FOR 1992.

FLDM CHART OF HARKETIRG IIME REPORTIMG.

```
COMPANY: 8ST
TITLE: REVIEN OF INTERHAL NUDIIS
    MARKETING TIME REPORTING
    L20-24-14-A-5F
    f BCI - PREMISE SAlES, FINANCE; BST - MARKETING
    !
        -CUSTOMER CONTACT
        NDVEMBER }199
auditor:
MP NO.
```



1 Manual tine record, claenders, logs, atc. flow into arketing office machandzation systen whare tive logs and tine reporto are prapared and roports ara made, then go into a data file which goes into the Cost Separations Systen.

Prowide copy of $\mathrm{I} / \mathrm{A}$ flow chart of Marketing Tine Reporting up $\mathrm{G}-2$.
Provida copy of Internal Audit UP H-1 which is the 10 questions asked by intarnal audit of the interviewers. 0K to provide a copy without answers.

UNIVERSE OF SAMPLE
PBC QUESTIDR:
How do you make sure all employees who are eligible to to selected for the sample are in the universe?

Who is responsible for adding and deleting amployees from the universe. What controls are in effect?
"To verify the sample universe, Laila receives a print of the total BCI enpoyees ond compares tine reporting tities on this list to thase previously listed on the semple universe. Any discrepancies she finds are sent to her interviewers for verification." H-7.4日.

PSC staff interview the statisticion who selected the sanple of eaployees to audit. Find out how he does this? Doss it agree with the procedures?

Find out what they are doing now about the week to be selected. Is it randou?


PSC allditor reviel both i/a hotes and plan an aloit.


INTRO:
10

21
SCOPE

Purpose: That procedures and controls exist and are adequate over the BCI intercompany billing and payment processes.

The audit was conducted in the BCI Administration and Finance Department.
26

| COIPAMY: | BST | 1 |
| :---: | :---: | :---: |
| IITLE: | REUIEX OF INTERHAL AUDITS |  |
|  | Intercohpany billing alid payments |  |
|  | BCI ADHINISfRATIOH AND FIMARGE |  |
|  | AUGUST 1992 |  |
|  | A20-10-06-A-S |  |
| AUDITOR: | RKY |  |

RESULIS:
10

17

Managenent lettar dated August 19, 1992 from J.D. Singleton, Operations, Maneger, I/A BSI to J. M. Schenk, Operations Manager, Finance-Human Resourcas BCI, Inc.

21
Itens 1 and 2
Various changes were made to the bllling methodology since March 1992. These are documented in various correspondence but not consolidated in billing aethodology documentation.

Itens $3: 4$


NOTES ON AUDIT MORKPAPERS

10


SCOPE:
Review Procedures to determine if controls are there to be in compliance with affilaited transaction rules. Gain an understanding of the FDC methodology and bill i methodology used to accumulate and bill BCI expenses. Ho transactions were reviewed.

PSC staff- if not in these workpapers. get workpapars which have the understanding of FOC methodology.

REsulTS

FOLLOW UP:

BS Comptrollers review time and billing ammauly, beginilhg april 1992.
I/A notes

PEC SECTION
REquest bi chart Of accounts in EFFECT IN january 1992. provide any CHANGES MADE DURING THE YEAR.

FROM THERE SC ASK FOR
GL, TRANSACTIOH LEDGER, DETAILED LEDGER. FOR 1992. THEN SELECT
EXPENSES IN CERTAiN ACCOUNTS AMD SEE WHAT CHARGES ARE GOING TO BCD.


I/A NOTES: BCI ACCOXPLISIHENTS FOR ISTQ 1992.

PSC Question - Explain how you dotarnine Return on Investement in 1991 and how you deteralned/calculated ROI in 1992. What is the difference. get sequence 17 balance sheet and roi . Source doc behind roi. Solect the month of October 1991 and May 1992.
and get explanation and source documentation.
get all bills to BST for these eonths.
and source doc's behind bills.
Look in file for lettor 10-19. If cannot find request.
Per $1 / A^{\prime}$

What is in the benefit accounts?
Only need input of benefits by account and average salary by cost pool by month.

This will also generate the necessary journal entries on a monthiy basis; from 20 to 5.


PSC question.
What is the difference between project billings and regular monthly billings. How many types of billings does $8 C I$ bill BsI7 Schedule by month for 1992 the different types of billings from BCI to B8I.

PSC question
What are BSC and BSI management billing between the four BBS companies for 1992. How much was billed each BBS compony in 1992.

PSC question
Apparently there are expense tracking reports $\cdots$ one before before staff allocation and one after allocation. These are balanced. Are the first expense tracking reports put into the billing model and then come out allocated.

Part of the I/A stated that the


PSC question -- Request copies of methodologies, why two different methodologies?

Re: ROI ="

Per Internal Audit flow chart page g-2
A.

1. data needed to come up with ROI.
a. assets from Sequence 17 keyed into investment modal.
b. Gat report from Investment Model and in this report total assets/liab verified against seq 17.
c. Investment up loaded to billing model.
2. Expense data from Expense Tracking Report.
a. This date is keyed into billing mode.
3. Direct sales productive hours froe Samplin System.

These are covered in another audit. L20-23-14.
a. The direct sales productive hours from sampling system are downloaded
b. The hours are summed and compared to control total.
c. The records are browsed and invalid records corrected.
d. Reocrds grouped into upload filed
-. Hour Summary report by upload file total.
f. Report balanced to control data
g. records uploaded to billing model.

8. After all three types of data are put into billing model:
a. Ro-sum hours and compara to report and hard total.
b. Total $\$$ input verified to expsinse tracking.
c. Model is processed and bill detail printed
d. Inoice nuabers and anounts arekeyed into model.
e. Invaice mode! works.
f. Involcas are printed.
g. B1lling compared to expense tracking.

Final output : Invoice and detail behind it.

PSC question -- above asked for data fron for the ROI.
What are the expenses in the expense trocking systen.
What accounts, what is in the accounts, are they reasonable for ratemaking,
Look at other audit for sampling systen.
how are tracking exepwses and propuctive hours allochteo to reg how reg. IS THIS IN THE BILLIMG MODEL OR IS THIS BEFURE PUT INTO BILLING MDDEL?
how does tife roi that 15 billed sst get mlocated to reg and now reg?
INTERHAL AlDIT PERFDRHED A TEST OF THE ROI
PRDCEDURES:


COMPANY:----------------

| COAPANY: | BST |  |
| :---: | :---: | :---: |
| . TITLE: | REVIEU OF INTERMAL ALOITS |  |
|  | Interconpany billing akd payments |  |
|  | BCI ADMIHISTRATION AND FINANCE |  |
|  | AUGUST 1992 |  |
| 1 | A20-10-06-A-S | 1 |

## ALDITIR: RKY

UP ND.
ESPI


Staff Allocation
6et copy of "BCI Cost Pools: Procedures for allocating 8CI expenses to Cost Pools and Allocating Porsentage of Cost Pools to BSI" per I/A page 6-B.2. and get someone to explain.

Gst Copy of "BCI Bllling to BSI Cost Pool Sumary", per 1/A page f-B.3. and get soneone to explain.

Get copy of a aonth's staff allocation sumary -- I/A used April.
Get coy of April and another month.
Get copy of Sparrow Staff Allocotion-based on tina reporting.
Actually get coples of all allocations that are used to allocate to cost pools or companies?

Get copy of Calculation of Reg, CPE and ASR by SUP allocations three month average that applies to the month we are getting.

Get Expense tracking report by Center and total.
Alloation of the Sales Cost Pools.
Allocation of the failowing were tested:
8 sup
the Poboc sales
government Compliance
Informen cost pools.
These are final cost pools before the axepsmes are divided inthe to BSI arkting, governeent complit and Inforn bils.

## RESHLT:

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compaHY: - вST
- title: review of interNal aldits
    INTERCOHPANY BILLING ANO PAYMENTS
    BCI ADHINISTRATION AND FINANCE
    \mathrm{ auGuST }
    i A2O-10-06-A-5 il
AUDITER: RKY
UP NO. ESPI
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## Staff Allocation

Gat copy of "BCI Cost Pools: Procedures for allocating BCI expenses to Cost Pools and Allocating Persentage of Cost Pools to BST" par 1/A page 6-8.2. and gat someone to explain.

Got Copy of MBCI Billing to BST Cost Pool Summary", per 1/A page 6-8.3. and get someone to explain.

Get copy of a month's staff allocation summary -- I/A used April.
Get coy of April and another month.
Get copy of Sparrow Staff Allocation-hased on time reporting.
Actually get copies of all allocations that are used to
allocate to cost pools or companies?
Get copy of Calculation of Reg, CPE and ASR by SUP allocations
three month average that applies to the month we are getting.
Get Expanse tracking report by Center and total.
Allocation of the Sales Cost Pools.
Allocation of the following were tested:

## 8 SUP

the Poof Sales
government Compliance
Inforva cost pools.
These are final cost pools before the exepsnes are divided inthe to BST marking, government compli and inform bile.

RESULT:

= TITLE:


AUDITOR: RY

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UP NO.
ESPI
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Get the bill to BSI for the month of ..., make sure get invoice attachment that shows the allocations to all states and reg non rag. Provide ald source documentations that show how each item was allocated; for example, B6I -reg, FI and B9T non reg FI.

Provide all source documentation on how the Roil RETURN UAS CALCALLTED AND and allocated and how the Roll taxes was calcualted and allocated. Get billing summary for the month includes all companies billed (including BST).

PSC note -- The expense tracking report is divided into different areas sub as salary and wages, pensions and benefits, travel, meals, lodging, training and education, relocation, sub, eenberhsip and Etnerataiment, otc. We want to get a sample in what in these. Check the rent to determine if at FDC or prevailing market, etc.

PSC note Does the interest earned on overnight investments offset the expenses on the tracking report that are allocated to the affiliates? What arb these investments?

How much interest in the year?





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促


Agreecent effactive Jomary 1， 1992 and contimue ualess terainoted upon 30 daye uritten notict．

日St whtherized BCI to ect on behalf of 891 as preaises sales
 88T，including but not lifited to，such notwork services as \％8T may be autherized to seli！purusant to the appropriate tariffs op contricts unde prgtuant to the kariffs in effect in the applfedbla regulatory jurisdiction．

This authorization is subject to terits．

Eithar party may perfori adainistrative services．

## reinemesericht ano biling

By the 15th wark day of the month each porty will reador ：bill tor the prior manth．All costs asacilated alth the services provided vill the in



Accerding to the bllilng sumary on 5 $51 / 3$ ，㫙 also perfores work for


RGOK FOR CONFRACTS UITH TIEBE PECDLE．KEN REOUEST

$$
\text { See } 50-6
$$

fecording to answer to 2－078，the company stotes that there are＇ma costs charged or allocised to BellSouth husiness gyatens，lne，to Bellsouth Cownications，Inc．

According to 50－1／3 ren 2－12J，attachment II，ECI doos bill 085 each

Pleaso explain the discrepancy．KEQ 2－078．A

Froe the ofgapluakion chart staplied to us in our enating with the tet people，it is wident that these uther affiliates are petting their btlls based on FDC alio． m 50－2／l．




[^0]:    **** NOTICE: NOT FOR USE OR DISCLOSURE OUTSIDE BELLSOUTH EXCEPT UNDER URITTEN AGREEMENT ***.

[^1]:    *** NOTICE: HOT FOR USE OR DISCLOSURE OUTSIDE BELLSOUTR EXCEPT UNOER WRITIEN AGREEMENI *... ** PAGE 1

[^2]:    $1^{1}$
    Date Provided: September 26, 1993

