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Tracy Hatch  
Senior Attorney

RECORDS AND  
REPORTING

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Tallahassee, FL 32301  
850 425-6364  
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August 27, 1999

791737-TP

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Complaint of AT&T Communications of the Southern States, Inc. against  
BellSouth Telecommunications, Inc. for improper application of switched access  
charges

Dear Mrs. Bayo:

Enclosed for filing are an original and fifteen (15) copies of AT&T  
Communications of the Southern States, Inc.'s above-referenced Complaint.

Copies of the foregoing are being served on all parties of record in accordance  
with the attached Certificate of Service.

Thank you for your assistance with this matter.

Yours truly,

Tracy Hatch

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

TH:kfj  
Enclosures

DOCUMENT NUMBER-DATE

10286 AUG 27 99

FPSC-RECORDS/REPORTING



ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of AT&T )  
Communications of the Southern )  
States, Inc. against BellSouth )  
Telecommunications, Inc. for )  
improper application of )  
switched access charges. )

Docket No. 991237

Filed: August 27, 1999

COMPLAINT

AT&T Communications of the Southern States, Inc. (AT&T), pursuant to Rules 25-22.036(2) and 28-106.201, Florida Administrative Code, hereby petitions the Florida Public Service Commission to order BellSouth to refund amounts improperly collected through the Carrier Common Line ("CCL") switched access rate element and to cease billing and collecting the CCL charge on certain types of calls in contravention of BellSouth's applicable tariffs and Chapter 364, Florida Statutes. In support of it request, AT&T alleges as follows:

1. AT&T, a company incorporated in New York, is authorized to provide telecommunications services in the state of Florida, including local, intraLATA and interLATA interexchange service. AT&T's business address is:

AT&T Communications of the Southern States, Inc.  
101 N. Monroe Street, Suite 700  
Tallahassee, Florida 32301  
(850) 425-6364

Copies of pleadings, notices and orders in this docket should be served upon Tracy Hatch at the above address.

DOCUMENT NUMBER-DATE

10286 AUG 27 89

FPSC-RECORDS/REPORTING

2. BellSouth Telecommunications, Inc., is a local exchange company certificated by this Commission to provide local exchange telecommunications service within Florida. BellSouth also provides intraLATA interexchange service in the State of Florida. BellSouth's business address is:

BellSouth Telecommunications, Inc.  
150 North Monroe Street  
Suite 400  
Tallahassee, Florida 32301

3. BellSouth provides intrastate switched access service in Florida pursuant to its Access Services Tariff. BellSouth levies access charges against interexchange carriers, including AT&T, for use of its local exchange facilities in connection with the origination and termination of interexchange calls. A component of such access charges is the carrier common line (CCL) charge, which is charged per access minute of use and is assessed upon all interexchange carriers ("IXCs") that use local exchange common line facilities for the provision of intrastate telecommunications services. See BellSouth Access Services Tariff, Section E3.10, Attachment 1, attached hereto. "Common Line" is defined in Section E2.6 as a line, trunk, pay telephone line or other facility provided under the General Subscriber Service Tariff of the Company, terminated on a central office switch. See Attachment 2. Section E6.7.1(A)(2) provides that usage rates for switched access rate elements "apply only when a specific rate element is used." (emphasis added) See Attachment 3.

4. BellSouth, like other local exchange carriers ("LECs"), offers a number of optional services to its customers which provide customers with features and functions that are not otherwise available over a plain old telephone service ("POTS") line. Because many of these services involve vendor "interception" of a call before it reaches the called party, they

collectively are referred to herein as "Vendor Intercepted Services"<sup>1</sup> (VIS). VIS may be provided by a LEC ("LEC VIS") or another vendor ("Additional VIS"). LEC VIS includes:

a. Call Forwarding: The call forwarding feature allows a subscriber to route calls that ordinarily would terminate at one number (the "Initially Called Number") to another number (the "Alternate Location Number").

b. Call Waiting: The call waiting feature provides an audible tone to let a single-line phone user know that another call is attempting to complete to the line. The service provides a hold feature that is activated by a switchhook flash that enables the user to put the existing call on hold so that the waiting call can be answered. Consecutive flashes allow the subscribing customer to talk alternatively to the original and the subsequent calling party.

c. Three-way Calling: The three-way calling feature enables a single-line phone user to add a third party to the call without operator assistance. To add a third party to the call, the three-way calling customer flashes the switchhook once to place the other party on hold, receives a dial tone, dials the third party's telephone number, and then flashes the switchhook again to establish the three way connection.

d. Foreign Exchange ("FX") Service: This service uses a private line to connect a subscriber's location with a distant (or "foreign") central office located outside the subscriber's local calling area. With this service, a phone number in the distant central office creates the appearance of the subscriber's presence in that distant central office. Calls originating from the subscriber of the FX service are billed as if they had been dialed from the distant central office,

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<sup>1</sup> The services described herein are referred to by their common industry names. The actual names of the services may vary among the LECs.

and calls terminating to the subscriber of the FX service are billed as if they had been received by the distant central office.

5. Additional VIS is available from entities that may or may not be affiliated with LECs, and include:

a. Voice Messaging or Fax Processing Services That Utilize Call Forwarding: These services enable a subscriber to forward calls that ordinarily would terminate at the subscriber's number to voice messaging ("VM") or fax processing ("FP") systems. Once the forwarded information is stored, the subscriber may retrieve his or her messages or faxes by dialing a specified number and entering a series of codes. In some cases, the VM and FP systems are located in the end office that provides local telephone service. In other cases, the VM and FP systems are located in facilities that are not collocated with the end office and are connected to the end office with a private or foreign exchange line.

b. Paging Services: Paging services are designed to deliver a message to a person whose exact whereabouts are unknown. Paging services employ selective radio signals that typically activate a paging receiver carried by the intended recipient to deliver to him a telephone number of the person who is trying to reach him. In some cases, paging systems are located in the end office that provides local telephone service. In other cases, paging systems are located in facilities that are not collocated with the end office and are connected to the end office through circuit connections.

6. Where LEC VIS and Additional VIS interact with an AT&T call, BellSouth overcharges AT&T for carrier common line charges associated with such calls. In some instances, BellSouth assesses multiple CCL charges for use of a single subscriber loop. In other instances, BellSouth assesses CCL charges for use of a local subscriber loop where no loop is

being used. Examples of the overcharges with respect to each of these services are described below:

a. Call Forwarding: With call forwarding, the local subscriber loop associated with the Initially Called Number is never used. Instead, the end office switch intercepts and redirects the call to the Alternative Location Number. However, notwithstanding the fact that no local subscriber loop (i.e. common line) is used for the Initially Called Number, BellSouth bills AT&T CCL charges associated with the Initially Called Number. The clearest illustration of the CCL overcharge associated with call forwarding occurs when an AT&T customer dials an Initially Called Number and is routed via Call Forwarding to an Alternative Location Number in another LATA. In that case, BellSouth inappropriately bills AT&T for terminating access to the Initially Called Number and for originating access to another LATA. That is, BellSouth treats this as two calls: one terminating to the Initially Called Number, and another that then originates from that number. See Attachment 4, pp. 1-5. Neither of these charges is appropriate because the local subscriber loop is never utilized, either to complete the call to the Initially Called Number or to originate the other call to the Alternative Location Number.<sup>2</sup>

b. Call Waiting: While a call is placed "on hold" with call waiting it is not being terminated at the subscriber's premises and is not using the local loop. Rather, it is held "in limbo" by the LEC at the point of interception in the LEC's end office. However, BellSouth bills AT&T CCL charges for the entire length of an AT&T call for which a subscriber utilizes the call

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<sup>2</sup> In the above example, AT&T is the carrier both for the call to the Initially Called Number and to the Alternative Location Number and appropriately would be assessed CCL charges for the eventual termination of the call. If the Called Party subscribes to a different long distance carrier, that carrier forwards the call and is responsible for eventual termination charges.

waiting service, even where the AT&T call is put on hold so that the subscriber can speak to another caller. CCL access charges should not be assessed while the call is "on hold" because the call does not use the local loop during this time.

c. Three Way Calling: The parties involved in a three-way call are interconnected through a bridging circuit in the LEC end office, which allows two conversations to take place simultaneously over a single loop. However, BellSouth applies double CCL charges, as if two local subscriber loops were being used. For example, where a subscriber utilizes the three-way calling feature to initiate two calls over AT&T's network, BellSouth bills AT&T two originating CCL charges in an amount measured by the entire length of the three-way call, even though only one such CCL charge is appropriate because only one loop is in use.

d. Foreign Exchange Service: When a subscriber to an FX service receives a call which was dialed to its foreign end office telephone number, the call travels from the distant central office to the subscriber over a private line, not a local subscriber loop. Therefore, terminating CCL charges on such calls are inappropriate. However, BellSouth charges AT&T terminating CCL charges for calls over the AT&T network that terminate to subscribers of FX service. Similarly, when a subscriber to an FX service initiates a call to someone else by utilizing its private line connection to the foreign end office, the call travels from the subscriber's premises to the distant central office over a private line, not a local subscriber loop. Therefore, originating CCL charges on calls are inappropriate. However, BellSouth charges AT&T originating CCL charges for calls over the AT&T network that originate from subscribers of FX service. See Attachment 4, p. 6-7.

e. Voice Messaging (VM) and Fax Processing Services (FP)utilizing Call Waiting: When a VM or FP subscriber receives a voice mail message or a fax, the call is intercepted and

forwarded by the LEC to a storage system that can record messages or receive faxes.

Terminating CCL charges for the forwarded call are inappropriate for two reasons.

First, where BellSouth forwards an AT&T call through a mechanism such as its busy/no answer service to BellSouth's or some other entity's VM or FP system, BellSouth (or other VM or FP provider), as the second carrier, is responsible for any charges associated with transporting the forwarded call to the VM provider. The expenses for such transport therefore should be charged to the VM service provider and recovered from its subscribers, rather than assessed to AT&T as CCL charges.

Second, the link between the central office switch and the VM system is a transport link, not a common line, so CCL charges (which are properly assessed for the use of a subscriber loop connecting the customer's premises with the local exchange office) are inappropriate. BellSouth wrongly assesses AT&T terminating CCL charges for these calls, as if the calls were being delivered to the Initially Dialed Number of the voice mail subscriber, which they are not. See Attachment 4, p. 8.

f. Paging: Common line facilities are used to carry calls placed to end users but by definition, are not used to carry calls between carriers. When an AT&T call is placed to a paging system, the paging provider uses radio waves to transmit a signal to the end user. The provider of the paging service is a carrier, not an end-user; by definition, no common line facilities are used and terminating CCL charges for such calls are inappropriate. However, in at least some instances BellSouth charges AT&T terminating CCL charges as if calls to paging numbers utilized a local subscriber loop. See Attachment 4, p. 9.

7. Pursuant to Section 364.08, Florida Statutes, "[a] telecommunications company may not charge, demand, collect, or receive for any service rendered or to be rendered any



compensation other than the charge applicable to such service as specified in its schedule on file and in effect at that time.” Because BellSouth's tariffs do not provide for CCL charges in the situations described above, BellSouth has violated and continues to violate this statutory mandate.

8. In a parallel federal action now proceeding at the Federal Communications Commission regarding interstate VIS calls, BellSouth has not denied that calls associated with the services above are routed in the manner described herein. Instead, BellSouth responded essentially that nothing in the FCC's rules require that common line facilities must be utilized for each given call at issue. See Memorandum of BellSouth dated March 22, 1994; Attachment 5. Thus, BellSouth has not disputed AT&T's assertion that it is being billed multiple CCL charges for use of single carrier common line and CCL charges where no common line has been used.

9. BellSouth has billed AT&T inappropriately for CCL charges in the manner described above for least seven years, and continues to do so today. AT&T conducted a study of the access overcharges associated with the call forwarding, call waiting, and three way calling services, based on a review of traffic over its network for a 14 day period in 1994. AT&T collected data from AT&T's call records and screened such data to isolate calls associated with telephone numbers for which more than one call was recorded during a particular time period (the “overlap”). This data was further screened to eliminate calls for which the overlap could be attributable to some cause other than double billing associated with the services discussed above.<sup>3</sup> By screening such calls out, AT&T was able to determine that the duration of the overlap represented the over-billed period. The results of the study confirm that AT&T has been

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<sup>3</sup> For example, calls associated with PBX equipment and multi-line hunt groups were screened out.

overcharged for CCL usage since at least 1993. AT&T contacted BellSouth in early 1994 and requested that BellSouth cease all such inappropriate billing. Other than belated and apparently partial correction for paging services, BellSouth has failed to correct those billing procedures.

10. The amount of such overcharges is unknown to AT&T because the information and documents required to determine the overcharges are within the possession, custody and control of BellSouth. In addition, AT&T has no data from which it could estimate the damages associated with the foreign exchange, voice mail and fax processing services. The information and documents required to determine such overcharges are within the possession, custody and control of BellSouth.

11. AT&T has attempted to resolve this matter with BellSouth through negotiation. The negotiations have failed to provide any meaningful results either with respect to refunding amounts overcharged or ceasing to overcharge AT&T.

12. BellSouth's access billing practices with respect to the VIS features described above result in multiple charges for use of a single carrier common line and result in charges where common line facilities have not been used. BellSouth's practices are inconsistent with the language in its tariff and result in an assessment of charges higher than those set forth in its Access Services Tariff. As shown above, BellSouth's application of CCL charges is in clear contravention of its Access Services Tariff and in violation of Section 364.08, Florida Statutes.

13. BellSouth's practice of charging multiple carrier common line charges for a single use of a common line and charging carrier common line charges when there is no use of common line facilities further constitutes an unfair and anticompetitive practice in violation of Section 364.01(4)(g), Florida Statutes.

**WHEREFORE**, for the reasons stated herein, AT&T respectfully requests that the Commission:

a. Find that BellSouth's practices with respect to carrier common line charges are unfair and anticompetitive in violation Section 364.01(4)(g), Florida Statutes, because they result in multiple charges for a single use of the subscriber line and because they result in a charge for use of the subscriber line when no such line is used;

b. Find that BellSouth's practices with respect to carrier common line charges are in contravention of the terms of its Access Services Tariff and violate Section 364.08, Florida Statutes, because such practices result in multiple charges for a single use of the subscriber line and in charges for use of the common line facility when no such facility is used;

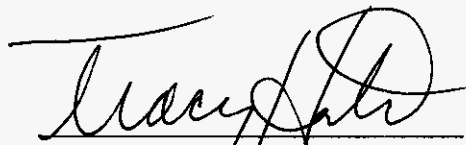
c. Order BellSouth to refund the amounts improperly collected through inappropriate application of the CCL rates to VIS call types as described together with interest thereon computed from the date of AT&T's payments of the excess amounts to the defendants;

d. Order BellSouth to cease such unlawful billing practices so that the overcharges do not recur; and

e. Grant such other or further relief as may be just and proper.

Respectfully submitted, this 27<sup>th</sup> day of August, 1999.

AT&T Communications of the Southern States, Inc.

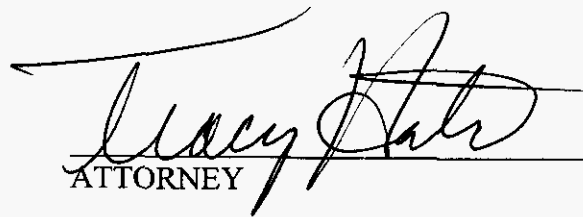


TRACY HATCH  
101 North Monroe Street,  
Suite 700  
Tallahassee, Florida 32301  
(850) 425-6364

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished  
via Hand Delivery to the following parties of record on this 27<sup>th</sup> day of August, 1999:

Nancy B. White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

  
ATTORNEY

ATTACHMENT 1

OFFICIAL APPROVED VERSION, RELEASED BY BSTHQ

BELLSOUTH  
TELECOMMUNICATIONS, INC.  
FLORIDA  
ISSUED: August 1, 1997  
BY: Joseph P. Lacher, President -FL  
Miami, Florida

ACCESS SERVICES TARIFF

Fifth Revised Page 11  
Cancels Fourth Revised Page 11

EFFECTIVE: October 1, 1997

**E3. CARRIER COMMON LINE ACCESS**

**E3.10 Rates and Charges (Cont'd)**

A. The rate for Carrier Common Line Access is: (Cont'd)

1. Per Originating Access Minute (Cont'd)

|   | Rate     | USOC |
|---|----------|------|
| (a) BellSouth Telecommunications, Inc. - BellSouth SWA FGA, BellSouth SWA FGB, BellSouth SWA FGD, BellSouth SWA LSBSA, BellSouth SWA TSBSA 1 and BellSouth SWA TSBSA 3. | \$.01000 | NA   |
| (b) Indiantown Telephone System - Feature Groups A, B, D, LSBSA and TSBSA Technical Options 1 and 3   | .0247    | NA   |
| (c) For all other Independent Companies concurring in this Tariff   | .0304    | NA   |

2. Per Terminating Access Minute

|   |         |       |
|---|---------|-------|
| (a) BellSouth Telecommunications, Inc. - BellSouth SWA FGA, BellSouth SWA FGB, BellSouth SWA FGD, BellSouth SWA LSBSA, BellSouth SWA TSBSA 1 and BellSouth SWA TSBSA 3. | .01767  | NA    |
| (b) Indiantown Telephone System - Feature Groups A, B, D, LSBSA and TSBSA Technical Options 1 and 3   | .0325   | NA    |
| (c) Frontier Communications of the South, Inc. - Feature Groups A, B, D, LSBSA and TSBSA Technical Options 1 and 3  | .034420 | NA R) |
| (d) For all other Independent Companies concurring in this Tariff   | .0382   | NA    |

ATTACHMENT 2

OFFICIAL APPROVED VERSION, RELEASED BY BSTHQ

BELLSOUTH  
TELECOMMUNICATIONS, INC.  
FLORIDA

ACCESS SERVICES TARIFF

First Revised Page 52  
Cancels Original Page 52

ISSUED: February 14, 1997  
BY: Joseph P. Lacher, President -FL  
Miami, Florida

EFFECTIVE: March 1, 1997

**E2. GENERAL REGULATIONS**

(T)

**E2.6 Definitions (Cont'd)**

**COLLOCATOR**

The term "Collocator" denotes any person, corporation, or other legal entity with whom the Company has negotiated for the purpose of provisioning an *BellSouth* Expanded Interconnection Service arrangement in accordance with the *BellSouth Expanded Interconnection Service* tariff provisions.

(T)

**COMMITMENT GUARANTEE**

The term "Commitment Guarantee" denotes a program under which the Company will provide a credit to the end user's account, under conditions set forth in E2.4.16 preceding, for certain services in those instances when the Company's installation or repair commitment is not met due to Company reasons.

→ **COMMON LINE**

The term "Common Line" denotes a line, trunk, pay telephone line or other facility provided under the General Subscriber Service Tariff of the Company, terminated on a central office switch. A common line-residence is a line or trunk provided under the residence regulations of the General Subscriber Service Tariff. A common line-business is a line provided under the business regulations of the General Subscriber Service Tariff.

**COMMUNICATIONS SYSTEM**

The term "Communications System" denotes channels and other facilities which are capable of communications between terminal equipment provided by other than the Company.

**CONDUIT SPACE**

The term "Conduit Space" denotes any reinforced passage or opening in, on, under/over or through the ground between the feeder route conduit system (entry point) and cable vault location capable of containing communications facilities, and includes: cable entrance facilities; main conduit; ducts; inner ducts; gas traps; underground dips such as short sections of conduit under roadway, driveways, parking lots and similar conduit installations; required to bring the collocator-provided fiber optic feeder cable into the Company central office.

**CUSTOMER LOCATION**

The term "Customer Location" denotes a carrier's premises within the Local Access Transport Area (LATA).

**DATA TRANSMISSION (107 TYPE) TEST LINE**

The term "Data Transmission (107 Type) Test Line" denotes an arrangement which provides for a connection to a signal source which provides test signals for one-way testing of data and voice transmission parameters.

**DECIBEL (dB)**

The term "Decibel" denotes a unit used to express relative difference in power, usually between acoustic or electric signals, equal to ten (10) times the common logarithm of the ratio of two signal powers.

(M)

OFFICIAL APPROVED VERSION, RELEASED BY BSTHQ

BELLSOUTH  
TELECOMMUNICATIONS, INC.

ACCESS SERVICES TARIFF

First Revised Page 87  
Cancels Original Page 87

FLORIDA  
ISSUED: February 14, 1997  
BY: Joseph P. Lacher, President -FL  
Miami, Florida

EFFECTIVE: March 1, 1997

## E6. BELLSOUTH SWA SERVICE

### E6.6 Obligations of the IC (Cont'd)

#### E6.6.5 Billing Data For Terminating Usage

When an IC uses the service(s) of an alternative access provider or alternative tandem service provider and as a result the Company is unable to record usage terminated via dedicated trunks with sufficient specificity to identify the access IC of record, the alternative access provider or alternative tandem service provider must provide the Company with billing data so the Company can properly measure and bill the access minutes. The record that will be used for the transmission of data is the 110120 record. A description of the record and the fields contained can be found in BellCore Publication Sr-STS-000320, Message Interface. It is the responsibility of the alternative access provider or alternative tandem service provider to provide the billing data information to the Company on a dialy basis. Failure on the part of the alternative provider to comply with the requirements of this paragraph will result in the Company's billing the alternative provider all terminating access minutes.

### E6.7 Rate Regulations

This section contains the specific regulations governing the rates and charges that apply for *BellSouth SWA* service.

#### E6.7.1 Description and Application of Rates and Charges

- A. There are three types of rates and charges that apply to *BellSouth SWA* service. These are monthly recurring rates, usage rates and nonrecurring charges. These rates and charges are applied differently to the various rate elements as set forth following.
1. Monthly Rates
 

Monthly rates are flat recurring rates that apply each month or fraction thereof that a specific rate element is provided. Elements having a monthly "per mile" charge are charged per mile, per month. For the Switched DNAL, the applicable mileage band rate will be applied per mile, per month. For billing purposes each month is considered to have 30 days.
  2. Usage Rates
 

Usage rates are rates that apply only when a specific rate element is used. These are applied on a per access minute basis or on a per call basis. *BellSouth SWA* Common Transport transmission rates will be applied on a per minute of use, per mile basis. Usage rates are accumulated over a monthly period.

    - a. *BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening Service*

A per call charge, as specified in E6.8.4 following, applies for each 800 call utilizing *BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening* service for which an *BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening* service IC is identified.
    - b. *BellSouth SWA 500 Service*

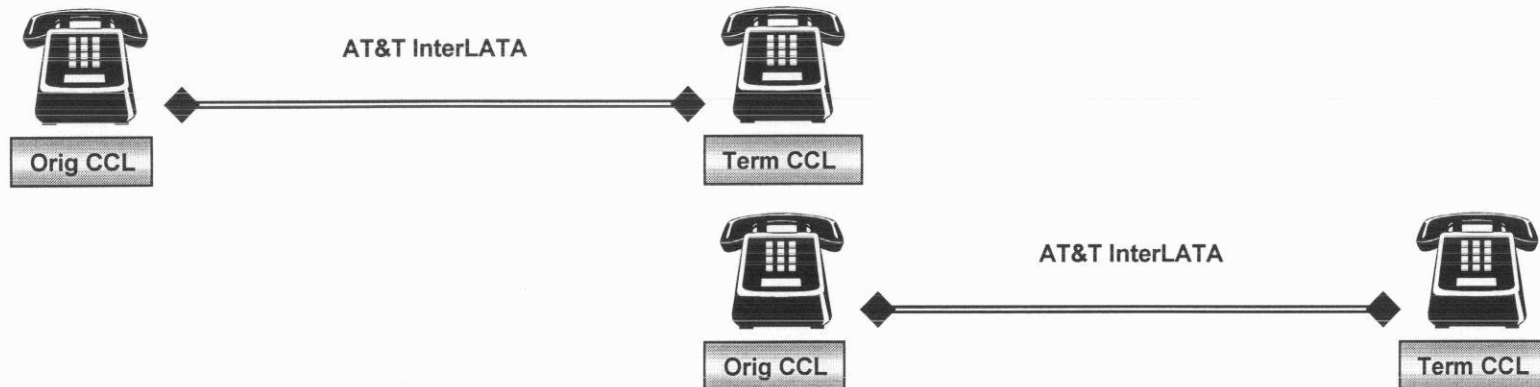
A per call charge, as specified in E6.8.13 following, applies for each 500 call.
  3. Nonrecurring Charges
 

Nonrecurring charges are one-time charges that apply for a specific work activity (i.e., installation of new service or change to an existing service). The types of nonrecurring charges that apply for *BellSouth SWA* service are: installation of new service, installation of optional features and BSEs, service rearrangements, transfer of service, *BellSouth SWA 500 service*, *BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening service* and *BellSouth SWA 900 service*.

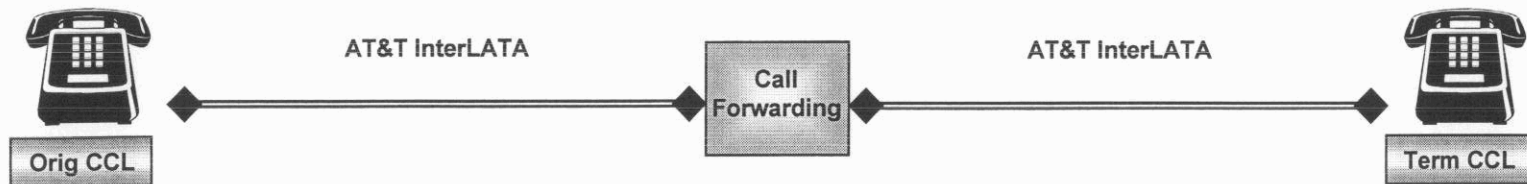
# VIS Call Flow Evaluation

## Call Forwarding: AT&T InterLATA to AT&T InterLATA

- Current Billing as Two Calls



- Corrected Billing for Single Carrier of Single Call





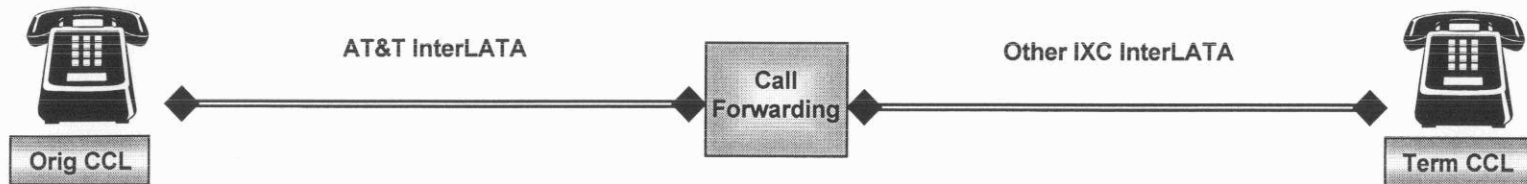
# VIS Call Flow Evaluation

## Call Forwarding: AT&T InterLATA to Other IXC InterLATA

- Current Billing as Two Calls



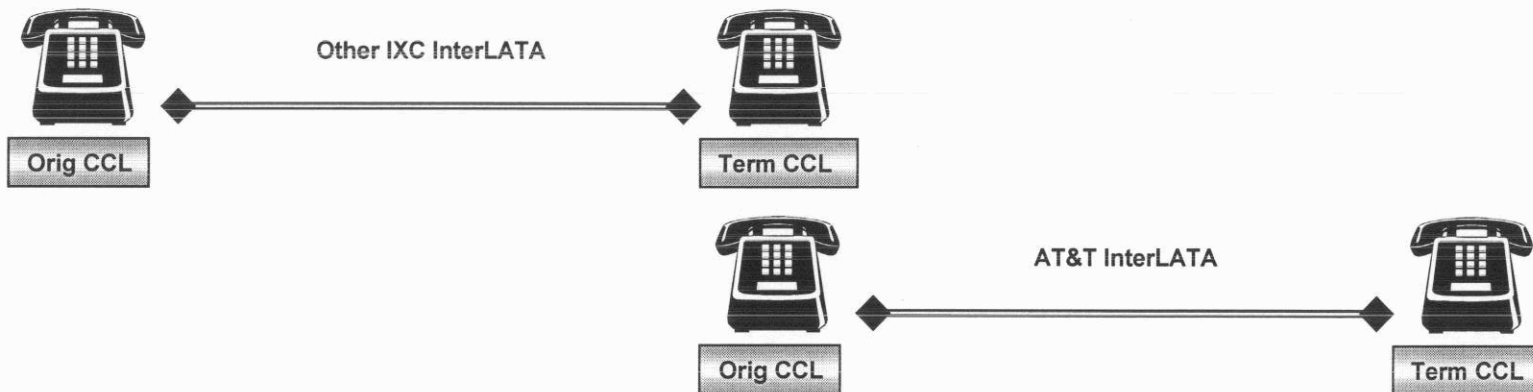
- Corrected Billing for Co-Carriers of Single Call



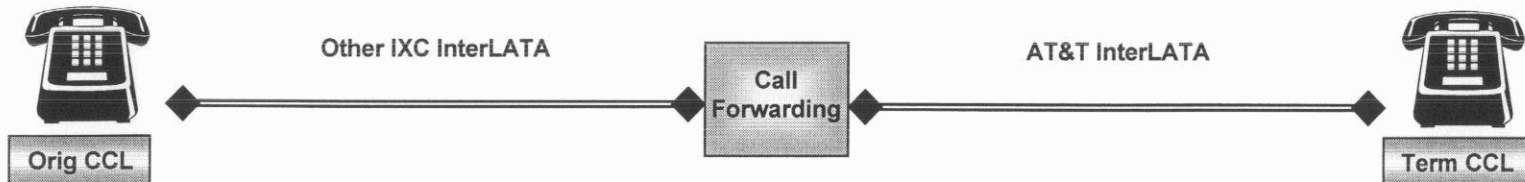
# VIS Call Flow Evaluation

## Call Forwarding: IXC InterLATA to AT&T InterLATA

- Current Billing as Two Calls



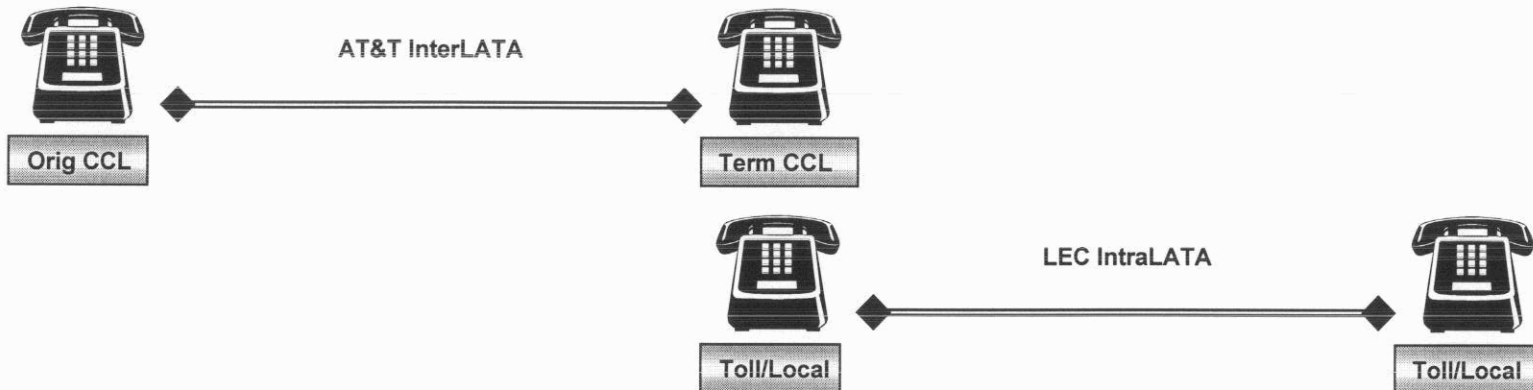
- Corrected Billing for Co-Carriers of Single Call



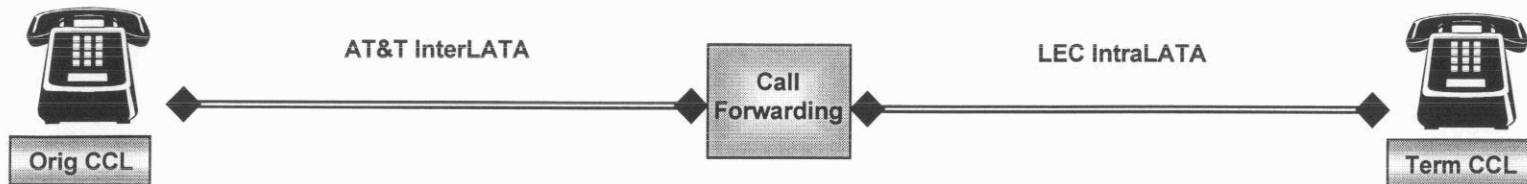
# VIS Call Flow Evaluation

## Call Forwarding: AT&T InterLATA to LEC IntraLATA

- Current Billing as Two Calls



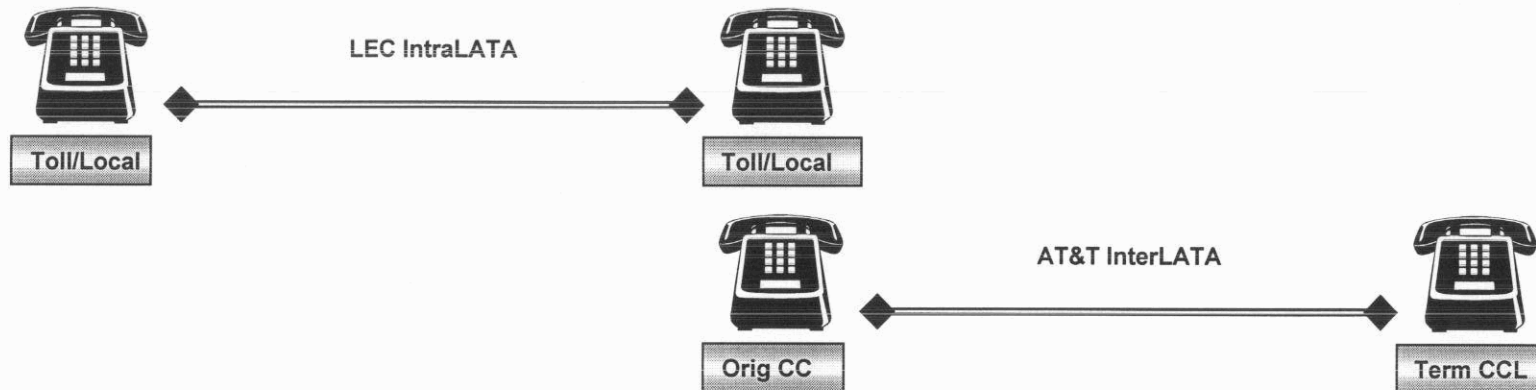
- Corrected Billing for Co-Carriers of Single Call



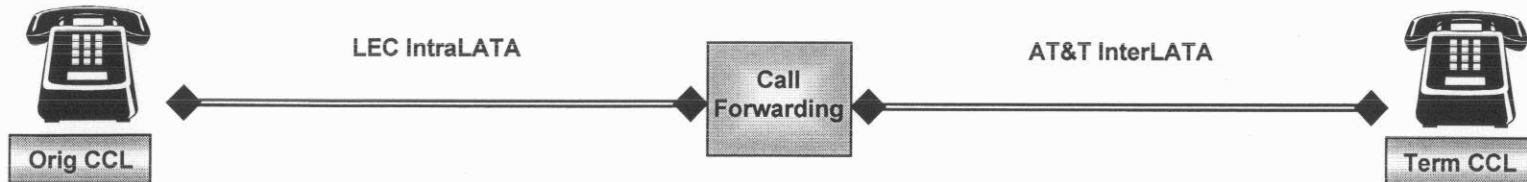
# VIS Call Flow Evaluation

## Call Forwarding: LEC IntraLATA to AT&T InterLATA

- Current Billing as Two Calls



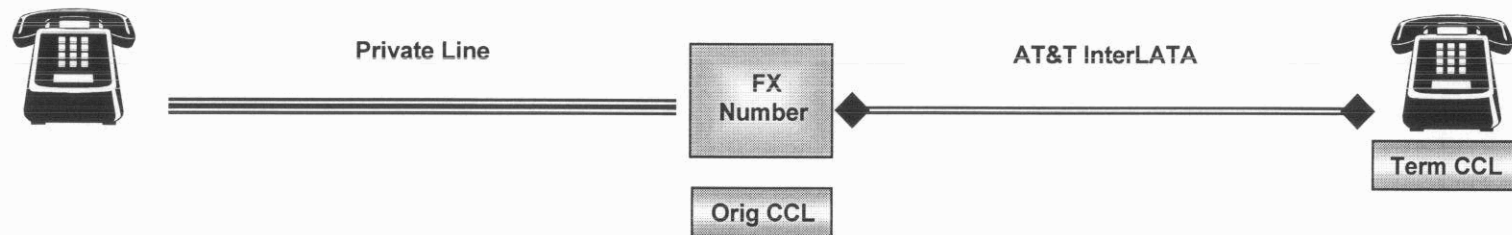
- Corrected Billing for Co-Carriers of Single Call



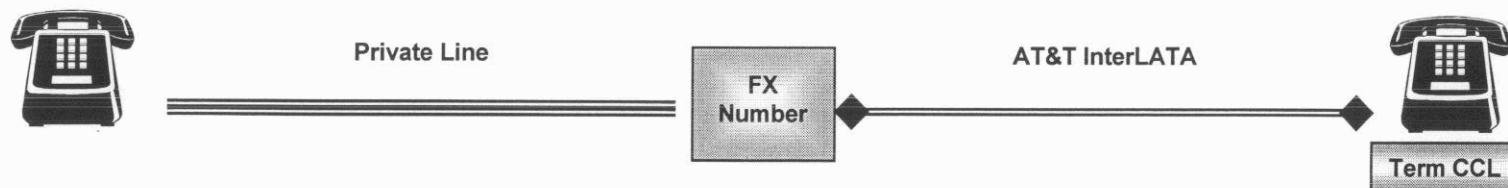
# VIS Call Flow Evaluation

Foreign Exchange: FX Number to AT&T InterLATA

- Current Billing as Two-Ended Call



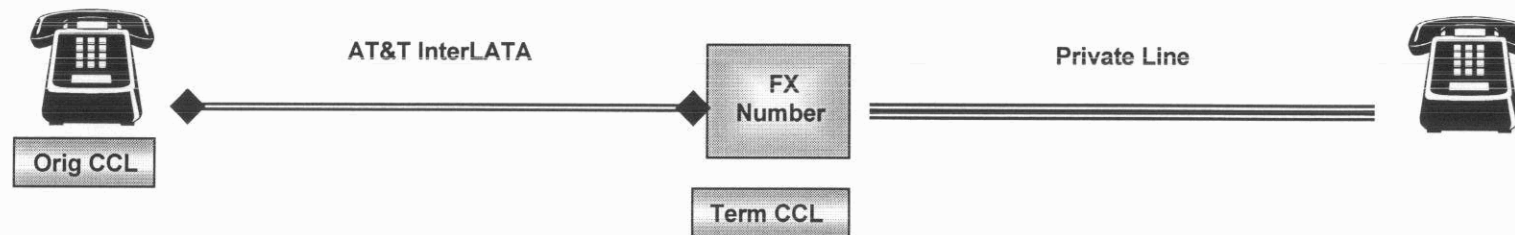
- Corrected Billing as One-Ended Call



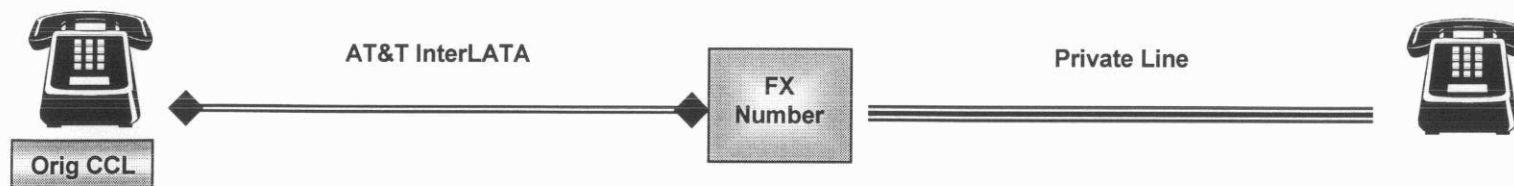
# VIS Call Flow Evaluation

Foreign Exchange: AT&T InterLATA to FX Number

- Current Billing as Two-Ended Call



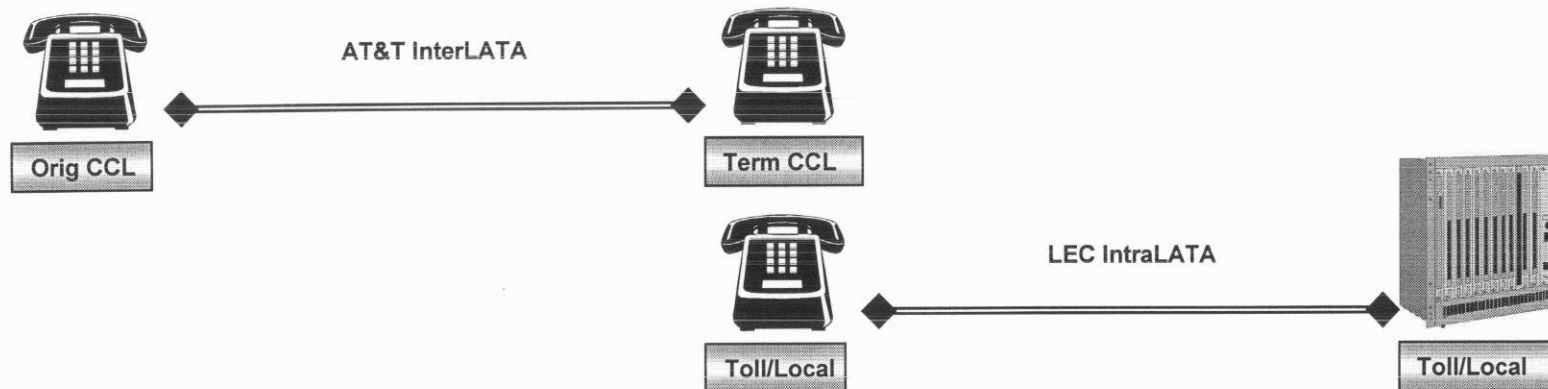
- Corrected Billing as One-Ended Call



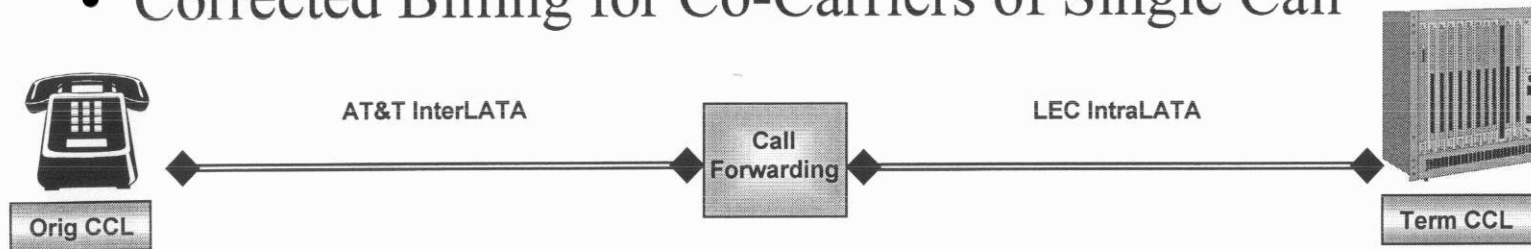
# VIS Call Flow Evaluation

## Call Forwarding: AT&T InterLATA to LEC VM

- Current Billing as Two Calls



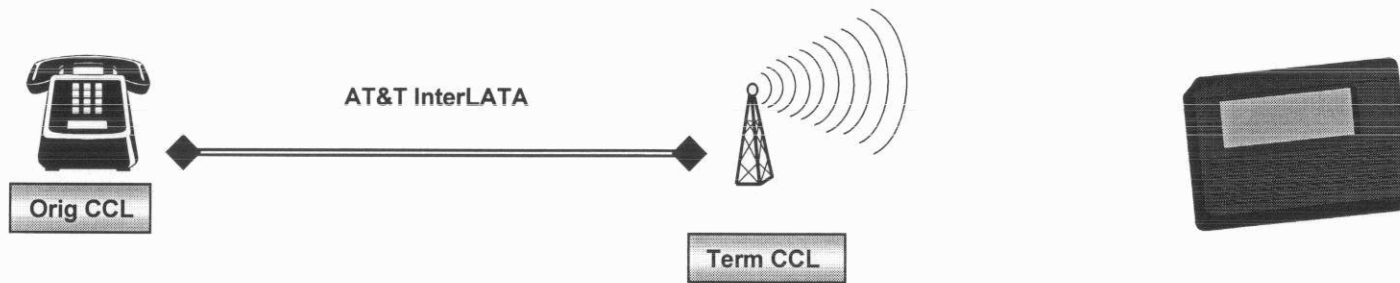
- Corrected Billing for Co-Carriers of Single Call



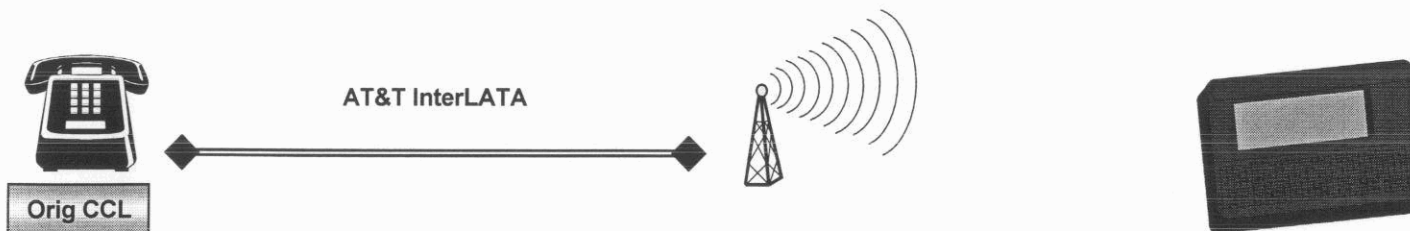
# VIS Call Flow Evaluation

Paging: AT&T InterLATA to Paging Number

- Current Billing as Two-Ended Call



- Corrected Billing as One-Ended Call





## ATTACHMENT 5

3-22-94

**APPLICATION OF SWITCHED ACCESS SERVICE  
ELEMENTS CARRIER COMMON LINE AND LOCAL SWITCHING**

BellSouth has reviewed the FCC's Part 69 rules relative to the application of Carrier Common Line (Part 69.105) and Local Switching (Part 69.106) charges for the various scenarios provided by AT&T. Those scenarios are attached with the rate elements shown that BellSouth believes are appropriate.

Under the scenarios presented by AT&T, the Carrier Common Line (CCL) and Local Switching (LS) charges in question are being appropriately assessed to AT&T and the other interexchange carriers (IXCs).

Clearly, AT&T is an IXC which utilizes local exchange switching facilities and local exchange common line facilities. Nothing in the Commission's rules require that such facilities have to be utilized for each given call at issue. The rules do not say that such charges are to be assessed to IXCs which utilize such facilities for the particular call at issue, but rather that such charges are to be assessed upon IXCs "that use local exchange switching facilities (and common line local exchange facilities) for the provision of interstate...services."

Additionally, the rules specify that LS and CCL charges are to be assessed per "access minute of use", and the rules specify how those minutes of use are to be measured. With respect to the scenarios presented by AT&T the only exception which the Commission has explicitly provided for is where the facility from the end office is a cellular/RCC facility.

BellSouth does not believe that it has the latitude to deviate from the existing Part 69 Rules without a rulemaking. In addition, given the nature of AT&T's request and the industry changes made since divestiture, as well as these forthcoming, BellSouth believes that it is inappropriate to make "piecemeal" changes to the application of these rate elements. Such changes are more appropriately handled within a rulemaking process under the auspices of a more general access reform.