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PAUL A. STRASKE

May 24, 1996

HAND-DELIVERED

Blanca S. Bayo, Director
Division of Records and Reporting
Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

Re: Joint Complaint of Florida Interexchange Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc., against BellSouth Telecommunications, Inc.
Docket No. 960658-TP

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and sixteen copies of the Joint Complaint of Florida Interexchange Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc., against BellSouth Telecommunications, Inc., in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Yours truly,

Joseph A. McGlothlin
Joseph A. McGlothlin

JAM/jei

Enclosure

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

05793 MAY 24 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Florida)
Interexchange Carriers Association,)
MCI Telecommunications Corporation,)
and AT&T Communications of the)
Southern States, Inc., against)
BellSouth Telecommunications,)
Inc.)

DOCKET NO. 960658-TP

FILED: May 24, 1996

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JOINT COMPLAINT

Pursuant to Rule 25-22.036, Florida Administrative Code, the Florida Interexchange Carriers Association ("FIXCA"), MCI Telecommunications Corporation ("MCI"), and AT&T Communications of the Southern States, Inc. ("AT&T"), through their undersigned counsel, hereby file their Joint Complaint against BellSouth Telecommunications, Inc. ("BellSouth"), and allege as follows:

1. FIXCA is an industry association of Interexchange Carriers who are authorized to provide intraLATA and interLATA interexchange services in the State of Florida. FIXCA's business address is:

Florida Interexchange Carriers Association, c/o
Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
117 South Gadsden Street
Tallahassee, FL 32301.

2. MCI, a Delaware corporation, is authorized to provide telecommunications services, including intraLATA interexchange service, in the State of Florida. MCI's business address is:

MCI Telecommunications Corp.
c/o Martha McMillin, Senior Attorney
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342.

DOCUMENT NUMBER-DATE

05793 MAY 24 96

FSC-RECORDS/REPORTING

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

AT&T Communications of the Southern States, Inc.
c/o Michael W. Tye
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301

4. BellSouth, a Georgia corporation, is a certificated local exchange company that provides intraLATA interexchange service in the State of Florida. BellSouth's business address is:

BellSouth Telecommunications, Inc.
c/o Marshall M. Criser
150 South Monroe Street
Sun Bank, Bldg., Suite 400
Tallahassee, FL 32301.

Jurisdiction and Authority of the Commission.

5. The Commission has statutory authority to ensure that all providers of telecommunication services in Florida are treated fairly, and to prevent anticompetitive practices by telecommunication providers subject to its jurisdiction. Section 364.01(4)(f), Florida Statutes (1995).

Explanation of How Complainants' Substantial Interests Are Affected.

6. In Order No. PSC-95-0203-FOF-TP, issued in Docket No. 930330-TP on July 31, 1995, the Commission determined it would be in the public interest to increase competition in the intraLATA market by enabling customers to pre-select, from competing alternatives, the interexchange carrier who will carry the intraLATA calls the customer initiates with the convenient,

universally familiar 1+ dialing convention. (Prior to this decision all 1+ intraLATA traffic had been reserved to the serving local exchange companies, including BellSouth). The Commission ordered the four largest local exchange companies, including BellSouth, to begin installing the technical capability to make such pre-selection of intraLATA carriers possible, and directed them to implement "1+ intraLATA presubscription" by December 31, 1997.

7. All appeals relating to Order No. PSC-95-0203-FOF-TP having been withdrawn, BellSouth (and the other large local exchange companies) are presently in the process of preparing to introduce intraLATA presubscription.

8. In addition to the obvious technical requirements associated with intraLATA presubscription, BellSouth (and the other local exchange companies) must devise the business practices and procedures that will govern its implementation. Many of these practices relate to the manner in which BellSouth contacts and/or communicates with its local exchange service customers regarding the customer's right and opportunity to choose a carrier other than BellSouth to carry intraLATA calls initiated by dialing 1+. In its local exchange service area BellSouth is the gatekeeper to the intraLATA competition ordered by the Commission. If in its role as the dominant local exchange carrier BellSouth engages in anti-competitive measures designed to persuade the customer to retain BellSouth as the customer's intraLATA carrier or impede the customer's selection of an alternative intraLATA carrier, the

Commission's decision to increase opportunities for intraLATA competition would be frustrated. It is therefore essential to the carrying out of the Commission's policy decision that the interface between BellSouth (when acting in its role as provider of local exchange service) and the customer relative to informing the customer of available options for intraLATA service and/or responding to the customer's selection be fair, reasonable, and non-discriminatory. As providers of intraLATA services who will continue to experience a competitive disadvantage until all competitors' intraLATA services are made available to potential customers via the 1+ dialing pattern on a fair and non-discriminatory basis, Complainants' substantial interests would be affected by any anticompetitive practice designed to distort, subvert, or impede the implementation of the policy adopted by the Commission in Order No. PSC-95-0203-FOF-TP.

Ultimate Facts Alleged:

9. For several months, MCI, AT&T and other carriers have been negotiating with BellSouth in an effort to ensure that the practices and procedures BellSouth is developing to govern the implementation of 1+ intraLATA presubscription are fair, just, reasonable, and non-discriminatory. The discussions have led to mutually acceptable approaches to some aspects of the implementation process.

10. With respect to certain other issues, however, BellSouth is pursuing practices and procedures that are unfair, unreasonable, and anticompetitive. Despite the fact that many of the fair and

neutral practices governing contacts between BellSouth and customers that have been in place for some time in the analogous context of interLATA carrier selection could easily be adapted to the intraLATA situation, BellSouth is creating new, different, and biased procedures with which to implement 1+ intraLATA presubscription. Upon information and belief, BellSouth intends to unfairly leverage its position as dominant local exchange service provider to thwart competition in the intraLATA market by engaging in the following anticompetitive practices:

- (a) BellSouth has provided scripts and training materials to its customer service representatives that call for the BellSouth representative to promote BellSouth's intraLATA service to new local exchange customers or customers ordering an additional line before the representative offers to identify the customer's intraLATA carrier options. While the scripts and training materials being developed by BellSouth have changed over time (see Exhibits A and B), the discriminatory promotion of BellSouth's intraLATA service, to the prejudice of competing carriers, has been a common theme throughout their development.
- (b) BellSouth has prepared messages for directories and customer bills that wrongly imply that BellSouth "owns" the intraLATA calling area. Such assertions of geographical entitlement would mislead potential

customers with respect to BellSouth's competitive position relative to other intraLATA carriers and discourage the local exchange customer from considering alternatives for the customer's intraLATA service needs.

(c) BellSouth has adopted a policy of imposing a "change of Preferred Interexchange Carriers" (PIC) charge on an existing customer's initial exercise of the customer's right to change intraLATA carriers, even though no such charge will be imposed on new customers. Like new customers, existing customers will have had no opportunity to select an alternative carrier prior to the implementation of Order No. PSC-95-0203-FOF-TP. As is the case in the interLATA context, new and existing customers should be given a reasonable opportunity to designate their preferred carrier once without charge.

(d) BellSouth has adopted a policy of imposing two "change of PIC" charges on a customer who elects to change the customer's interLATA and intraLATA carriers at the same time, even though the selections constitute a single transaction and would warrant a single PIC change charge at most.¹

¹ In Docket No. 950330-TP, Southern Bell has submitted tariff revisions that embody the PIC charge policies that are the subject of this Joint Complaint. The Commission considered the tariff

- (e) With respect to a new customer who is undecided regarding the choice of an intraLATA carrier, BellSouth has devised a practice of "defaulting" the undecided customer to BellSouth's intraLATA service, rather than placing the new customer in a "no PIC" status until the customer makes an informed, affirmative selection of its intraLATA carrier from available alternatives.
- (f) BellSouth has adopted a policy of telling existing customers who contact BellSouth for the purpose of selecting a different intraLATA carrier that they must contact the new carrier to make such arrangements, rather than processing the change directly upon receiving the request. This practice differs from the way BellSouth intends to treat new customers who select an intraLATA carrier other than BellSouth. It injects an unnecessary impediment to the customer's exercise of choice that the Commission intended to facilitate through the issuance of Order No. PSC-95-0203-FOF-TP.

during the Agenda Conference of April 30, 1996. FIXCA and MCI appeared and objected to these features of the tariff. The Commission voted to place the tariffs in effect subject to subsequent proceedings that may be initiated by affected parties. Complainants intend to file a formal protest and demand a hearing on the proposed tariff provisions.

(g) BellSouth intends to utilize customer data that it obtains as a result of being the dominant provider of local exchange service to market its intraLATA service to customers who contact BellSouth (in its capacity as local exchange service provider) for other reasons (e.g. repair service) and who have not selected BellSouth as their carrier for intraLATA toll calls.

Statutes and Orders Violated

11. Individually and collectively, these practices and procedures are unfair, unreasonable, and anticompetitive, in that each is an attempt to leverage BellSouth's role as the dominant provider of local exchange service to discriminate against competing intraLATA carriers and in favor of BellSouth's own competitive intraLATA services. Individually and collectively, the practices and procedures violate Section 364.01(4)(f), Florida Statutes (1995). Moreover, they are violative of Order No. PSC-95-0203-FOF-TP, which, explicitly² and implicitly, envisioned that the implementation of the 1+ intraLATA dialing parity policy adopted by the Commission would take place on fair, reasonable, and non-discriminatory terms. If allowed to become effective, each of these practices would give BellSouth an unfair advantage, impede

² The Commission did not take evidence on or attempt to delineate the specific business practices that BellSouth should adopt to implement 1+ intraLATA presubscription fairly. However, it cited and approved a stipulation of parties to the effect that new customers would be made aware of their intraLATA choices in the same manner as they are informed of their interLATA options. Order No. PSC-95-0203-FOF-TP, at p. 38.

the ability of other carriers to compete for the intraLATA customers, and thereby stifle the competition that was the Commission's objective when it issued Order No. PSC-95-0203-FOF-TP.

Identification of Disputes of Material Fact

12. Complainants do not know at the present time whether BellSouth disputes any of the material facts alleged herein.

Request for Relief

13. Based on the foregoing, Complainants request the Commission to assert jurisdiction over this Complaint; expeditiously conduct a hearing on the matters complained of herein; determine that the practices and procedures for implementation of 1+ intraLATA presubscription identified and described herein are unfair, unduly discriminatory, and anticompetitive; and, using the practices successfully developed for the implementation of 1+ interLATA presubscription as a reference, prescribe practices and procedures that will prevent BellSouth from engaging in anticompetitive behavior, treat all

telecommunications companies fairly, and realize fair intraLATA competition among competing carriers based on true 1+ dialing parity on a presubscribed basis.

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201 S. Monroe Street, Suite 500
Tallahassee, Florida 32301

Attorney for AT&T Communications
of the Southern States, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Joint Complaint of Florida Interexchange Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc., against BellSouth Telecommunications, Inc., has been furnished by hand delivery* or by U.S. Mail to the following parties, this 24th day of May, 1996:

*Nancy B. White
c/o BellSouth
Telecommunications, Inc.
150 S. Monroe Street,
Sun Bank Building, Suite 400
Tallahassee FL 32301

*Noreen Davis, Esq.
FL Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Joseph A. McGlothlin

EXHIBIT A
INFORMATION PROVIDED BY BELLSOUTH
TO IXC'S IN JUNE 1995

Exhibit A

BELLSOUTH
TELECOMMUNICATIONS 

Exhibit A

Page 1 of 50

Richard B. Robertson
Sales Vice President

South E5F1
2525 Colonnade Parkway
Birmingham, Alabama 35243

EN91080957

June 16, 1995

TO: Interconnection Customers

SUBJECT: 1+ IntraLATA Presubscription - Customer Contacts

In our May 18, 1995 IC Workshop, we committed to provide you revised information concerning the procedures BellSouth would use in customer contacts in the IntraLATA Presubscription environment, as well as the procedures currently used in the InterLATA environment.

Enclosed is a document with scripts or other educational information for the various departments within BellSouth with employees who handle direct contact with end users for both the IntraLATA and InterLATA environments. The only changes in the IntraLATA procedures discussed in the May 18, 1995, workshop are those to be used by the Equal Access Service Center. There have been no other changes to the IntraLATA procedures. This information will be covered again in the IC Workshop scheduled for July 20, 1995.

Please refer any questions regarding this subject to your BellSouth Account Team Representative or Michael Hurst at 205 977-1103

Sincerely,

Michael D. Hurst for

Enclosure

BELLSOUTH

INTRALATA PRESUBSCRIPTION
CUSTOMER CONTACT INFORMATION

- 1) Customer Operations Units
 - Consumer Services
 - Small Business Services
 - BellSouth Business Systems

- 2) IPOS
 - Public Communications
 - Interconnection
 - o Enhanced Service Providers
 - o Independent Payphone Providers
 - o Equal Access Service Center
 - Operator Services

- 4) Network

BELLSOUTH

INTRALATA PRESUBSCRIPTION

CUSTOMER CONTACT INFORMATION

CUSTOMER OPERATIONS UNITS

COU INTRA Page 1

BELLSOUTH
CUSTOMER CONTACT INFORMATION
CUSTOMER OPERATIONS UNITS

CONSUMER, SMALL BUSINESS, BELLSOUTH BUSINESS SYSTEMS

NEW CUSTOMER (Meaning N and T orders) -

Order of sales negotiation

- 1) Local and vertical sales (same as today)
- 2) IntraLATA
- 3) InterLATA (same as today)

Approach on IntraLATA

- Generic explanation that customer has a choice of carrier to carry calls to nearby communities
- BST also carries those calls
- BST offers its services
- Ask customer if they would like to know the names of the other companies who carry these calls
 - o If yes - read names in random order (including SB/SCB)
 - o If no - PIC to BST

EXISTING CUSTOMERS

Approach on generic inquiry

- o Explain customer has choices
- o Explain BST offers the service

COU INTRA Page 2

N & T Customer Handling

Up Front _____ Statement (New customer adding a line)

Mr./Mrs. Customer due to recent changes in the competitive area/environment you now need to choose a carrier to carry calls you make to * cities in nearby communities/locations.

Southern Bell will be happy to continue to handle your calls for you. We offer volume discount and there is no calling plan to sign up for.

I also have a list of other companies who can carry these calls. Would you like me to read the list to you?

Use this table to determine action to take.

If customer responds . . .	Then you will . . .	And . . .
Yes	Read names of available carriers	enter/select chosen carrier for order
No	Thank customer for allowing us to be carrier of choice	populate/select BST LPIC of 0377 & LPCA of "30" (bus ofc)
I'm not sure	Explain that we will carry calls to nearby communities until notified of any change in customer's choice.	populate/select BST LPIC of 0377 and LPCA of "UN" for undecided and advise no charge will apply for order issued to designate initial PIC selection
What are volume discounts?	Explain volume discounts	populate/select customer's choice of carrier

*Nearby communities/locations are defined as calls made outside of the local call area.

CCU INTRA Page 1

Following are some guidelines to which we will adhere:

- Never provide information about a particular carriers' services, rates or other information which could influence customer's choice.
- Do not express preference for one carrier over another.
- Do not discuss vertical services at same time you are discussing INTRATA.

Listed below are example and non-example situations.

- EXAMPLE Customer asks, "Who has the lowest rates?" SR must advise that he/she does not know this information.
- NON-EXAMPLE Customer requests rate comparison information. SR states that the TV commercial mentioned that South Coast was lots cheaper than Dynamics.
- EXAMPLE Customer asks, "Who do you recommend?" SR responds that he/she can not offer any recommendations.
- NON-EXAMPLE Customer asks, "Who do you use?" SR responds, "All".
- EXAMPLE Now that we have finished discussing your call arrangements let's get a telephone number for you.
- NON-EXAMPLE SR says "Let's go ahead and choose your community carrier while you're thinking about your decision on the other calling features."

COU INTRA Page 4

Existing customers can call us or one of the carriers. When they call us we should use the following chart to decide what action to take.

If customer request is . . .	Then you will . . .	Then . . .
Generic	Explain to the customer he/she has choice of carriers. Make a sales pitch to the customer for them to keep BST as their LPIC.	Issue order with selected choice.
Keep BST	Review _____ to see if NPA NXX already converted.	-----
-	If NPA NXX has converted . . .	Issue "R" order. Change LPCA from "DF" to "30"
	If NPA NXX has not converted . .	Issue ?????
LPIC for Specific Carrier	Explain he/she has choices. Explain BST offers service. Make a sales pitch for customer to keep BST as their carrier.	Issue order with selected choice.
For List of Carriers	Refer customer to ?????	XXXXX

COU INTER Page 1

PRESUBSCRIPTION

CUSTOMER CONTACT SCRIPTS

INTERLATA ENVIRONMENT DISCLOSURE STATEMENTS

CURRENT WORDING

CUSTOMER OPERATIONS UNITS

EQUAL ACCESS DISCLOSURE STATEMENTS

A. UP-FRONT STATEMENT (RSC/BSC/VPC)

"SCB/SB will be handling long distance calls within your calling zone, you need to choose a Long Distance Carrier to handle calls made to places outside your SB/SCB calling zone. I have a list of companies serving your address, if you'd like for me to read them to you."

When the request is for a Federal Government account, the contact personnel may ask the following questions of the person placing the order: Will you be making a choice of the Long Distance Carrier or has that choice been made by someone else? If the person placing the order indicates that he/she will be making the choice, then the contact personnel should continue with the disclosure statement.

If the person is not authorized to make the choice, no further disclosure is necessary.

As soon as the subscriber indicates he/she understands the up-front statement and chooses a Carrier, no further disclosure is necessary.

The subscriber is advised to contact the selected Carrier to establish a billing account.

Should the subscriber indicate he/she is not familiar with Equal Access or does not understand your request, the following statement is given:

DISCLOSURE STATEMENT (RSC/BSC/VPC)

"You live in an area where you can choose a Primary Carrier to handle and bill calls you make outside your calling zone. If you do not choose a primary carrier and you want to place 1+ or 0+ calls outside your area, a special access code will be required from the company you wish to handle the call. The companies available are _____."

- o Offer carrier information from COFFI/CARRIER Screen.
- o The subscriber is advised to contact the Carrier to establish an account.

NOTE: Do not refer customers to U. S. Sprint unless customer requests Sprint telephone number.

B. "UNDECIDED" DISCLOSURE STATEMENT (RSC/BSC/VPC/ONLY) <-----

When the subscriber is undecided about a Carrier selection and requests to "shop" for a Carrier, provide the following statement:

"Mr. Subscriber, since you are not ready to select a Preferred Long Distance Company, you cannot complete 1+ or 0+ calls outside your SB/SCB calling area. It will be necessary for you to use an access code from the company you want to handle these calls. You will be restricted from reaching a long distance company operator when dialing 00- and SB/SCB will no longer provide operator assistance in reaching a long distance Carrier for the completion of an interLATA call. Also you must dial 10XXX+0 to reach an interLATA operator. The calls you will be able to complete are:

- 1+ or 0+ calls within SB/SCB's calling area,
- Calls to 800 and 900 numbers
- Calls to Directory Assistance
- 0 dialed calls to reach SB/SCB's operator

The subscriber may contact different Carriers for rates and/or other information prior to making a PIC choice.

COU INTER Page 3

The subscriber is advised to contact the selected Carrier, once a choice is made to establish and account.

IMPORTANT! Advise subscriber that a PIC change charge will not apply when a preferred Carrier is selected.

NOTE: If a subscriber requests to be connected to an interexchange carrier and that interexchange carrier is participating in Operator Transfer Service (OTS) SB/SCB's Operators can hand off that call. The Carriers support this service with per-call fees. Refer to Operator Transfer Service Operating Standards for more information.

C. "NON-QUOTE" DISCLOSURE STATEMENT

When a subscriber selects a Carrier that is listed on the "Non-Quote/Non-Negotiate" screen in COFFI/CARRIER Screen, the following disclosure statement should be provided:

"Mr. Subscriber, (name of IC) is providing a service in your area; however, it is a unique type service, (describe service from description on screen) and requires you to negotiate the service with them directly. The Carrier's telephone number is _____.

The subscriber must be advised that another preferred Carrier selection (or PIC NONE) must be made in order to process the order for local telephone service and that a PIC change charge is applicable if the PIC is changed to the "Non-quote" IC later.

If a subscriber placing a T&F order is presently PICed to the non-quote IC and the IC is serving the new address, use the following statement:

"Mr. Subscriber, my records show your present Long Distance Co. is (name of PIC on record). Do you wish to keep this Carrier as your preferred Carrier at your new address?"

If the subscriber wants to keep the same PIC, the order should be generated with the non-quoted IC.

NOTE: PIC NONE is not applicable for Public/Semi-Public.

COU INTER Page 4

D. "EQUAL ACCESS - T&F" - DISCLOSURE STATEMENT (Applicable only if same Carrier Available)

"Mr. Subscriber, my records show that your present Long Distance Company is _____. Do you wish to keep the same Carrier at your new address?"

- IF YES: "Please call (Carrier of record) to change your address and (if applicable) telephone number."

"REFER FOR BILLING" - Subscribers selecting a Long Distance Company must be advised to contact that company to establish a billing account.

E. "PIC NONE" - DISCLOSURE STATEMENT (RSC/BSC/VPC ONLY)

When the subscriber does not want a Preferred Long Distance Company, provide the following statement:

"Mr. Customer, since you have not selected a preferred Long Distance Company, you cannot complete 1+ or 0+ calls outside your SB/SCB calling area. It will be necessary for you to use an access code from the company you want to handle those calls. You will be restricted from reaching a Long Distance Company operator when dialing 00 - and SB/SCB will no longer provide operator assistance in reaching a long distance Carrier for the completion of an interLATA call. Also, you must dial 10XXX+0 to reach an interLATA operator. The calls you will be able to complete are:

- o 1+ or 0+ within SB/SCB calling area,
- o Calls to 800 or 900 numbers,
- o Calls to Directory Assistance,
- o 0 dialed calls to reach a SB/SCB operator."

The subscriber is advised:

"Should a preferred company be chosen at a later date, you should contact the Long Distance Company chosen, to establish an account and to submit the subscription order. A PIC change charge is applicable at that time."

COU INTER Page 5

F. "NON-NEGOTIATE IC" DISCLOSURE STATEMENT

When "Non-Negotiate" is reflected on the COFFI/CARRIER Screen, our Contact Personnel will quote that IC along with all of the other listed Carriers in the normal manner. If a subscriber requests the "Non-Negotiate" the Contact Personnel must advise the subscriber that this Carrier has requested that Southern Bell/South Central Bell not accept orders for them and that the subscriber should contact the Carrier. Explain to the subscriber that in order to process their request for local service, the subscriber must make another Carrier selection or choose the non-Presubscription option. Explain that a PIC change is applicable to change to the "Non-Negotiate" Carrier selection, if the Carrier submits an order on the subscriber's behalf at a later date.

Exception:

T&F order, if subscriber already has the "Non-negotiate" Carrier and is moving in the same wire center, the Contact Personnel may issue the order using that same IC.

DISCLOSURE STATEMENT

"Mr. Subscriber, (name IC) is serving your area but requests that you call them directly to discuss service arrangements. Their telephone number is _____."

BELLSOUTH

INTRALATA PRESUBSCRIPTION

CUSTOMER CONTACT INFORMATION

IPCS

PUBLIC COMMUNICATIONS

PUBLIC INTRA Page 1

BELLSOUTH
CUSTOMER CONTACT INFORMATION
IPOS
PUBLIC COMMUNICATIONS

IntraLATA Presubscription Disclosure Statement

Southern Bell/South Central Bell will be handling long distance calls made from the Public/Semi-Public telephone located on your premises which are to points within your Southern Bell/South Central Bell calling zone. You will need to choose a long distance carrier to handle 0+ dialed calls made from the pay telephone to points outside your Southern Bell/South Central Bell calling zone. I have a list of companies serving your area if you would like me to read them to you.

PUBLIC INTER Page 1

PRESUBSCRIPTION

CUSTOMER CONTACT SCRIPTS

INTERLATA ENVIRONMENT DISCLOSURE STATEMENTS

CURRENT WORDING

IPOS

PUBLIC COMMUNICATIONS

EQUAL ACCESS DISCLOSURE STATEMENTS

UP-FRONT STATEMENT (PUBLIC/SEMI-PUBLIC)

"You need to choose a Long Distance Company to handle 0+ dialed calls from the Public/Semi-Public telephone on your premises to points outside your Southern Bell/South Central Bell calling zone. I have a list of companies serving your address if you would like for me to read them to you."

DISCLOSURE STATEMENT (PUBLIC/-SEMI-PUBLIC)

"Your Public/Semi-Public telephone is located in an area where you should make a choice of a Long Distance Company to handle 0+dialed calls made from this telephone to points outside your South Central Bell/Southern Bell calling zone. The companies available are: _____."

BELLSOUTH

INTRALATA PRESUBSCRIPTION

CUSTOMER CONTACT INFORMATION

IPOS

INTERCONNECTION

ENHANCED SERVICE PROVIDERS

N & T Customer Handling

Up Front _____ Statement (New customer adding a line)

Mr./Mrs. Customer due to recent changes in the competitive area/environment you now need to choose a carrier to carry calls you make to * cities in nearby communities/locations.

Southern Bell will be happy to continue to handle your calls for you.

I also have a list of other companies who can carry these calls. Would you like me to read the list to you?

Use this table to determine action to take.

If customer responds . . .	Then you will . . .	And . . .
Yes	Read names of available carriers	enter/select chosen carrier for order
No	Thank customer for allowing us to be carrier of choice	populate/select BST LPIC of 0377 & LPCA of "BO" (bus ofc)
I'm not sure	Explain that we will carry calls to nearby communities until notified of any change in customer's choice.	populate/select BST LPIC of 0377 and LPCA of "UN" for undecided and advise no charge will apply for order issued to designate initial PIC selection
What are volume discounts?	Explain volume discounts	populate/select customer's choice of carrier

*Nearby communities/locations are defined as calls made outside of the local call area.

ESP INTRA Page 2

Following are some guidelines we must adhere to:

- Never provide information about a particular carriers' services, rates or other information which could influence customer's choice.
- Do not express preference for one carrier over another.
- Do not discuss vertical services at same time you are discussing intraLATA.

Listed below are example and non-example situations.

- EXAMPLE Customer asks, "Who has the lowest rates?" SR must advise that he/she does not know this information.
- NON-EXAMPLE Customer requests rate comparison information. SR states that the TV commercial mentioned that South Coast was lots cheaper than Dynamics.
- EXAMPLE Customer asks, "Who do you recommend?" SR responds that he/she can not offer any recommendations.
- NON-EXAMPLE Customer asks, "Who do you use?" SR responds, "AT&T".
- EXAMPLE Now that we have finished discussing your call arrangements let's get a telephone number for you.
- NON-EXAMPLE SR says "Let's go ahead and choose your community carrier while you're thinking about your decision on the other calling features."

ESP INTRA Page 3

Existing customers can call us or one of the carriers. When they call us we should use the following chart to decide what action to take.

If customer request is . . .	Then you will . . .	Then . . .
Generic	Explain to the customer he/she has choice of carriers.	Issue order with selected choice.
Keep BST	Review _____ to see if NPA NXX already converted.	-----
	If NPA NXX has converted . . .	Issue "R" order. Change LPCA from "DF" to "BO"
	-----	-----
	If NPA NXX has not converted . .	Issue ?????
LPIC for Specific Carrier	Explain he/she has choices. Explain BST offers service.	Issue order with selected choice.
For List of Carriers	Refer customer to ?????	XXXXX

PRESUBSCRIPTION
CUSTOMER CONTACT SCRIPTS
INTERLATA ENVIRONMENT DISCLOSURE STATEMENTS
CURRENT WORDING
IPOS
ENHANCED SERVICE PROVIDERS

The information exhibited in the Customer Operations Units section of this document beginning on COU INTER Page 1 is also used in the ESP Center for InterLATA customer contacts. Please reference that section of the document for details.

BELLSOUTH

INTRALATA PRESUBSCRIPTION

CUSTOMER CONTACT INFORMATION

IPOS

INTERCONNECTION

INDEPENDENT PAYPHONE PROVIDERS

N & T Customer Handling

Up Front _____ Statement (New customer adding-a line)

Mr./Mrs. Customer due to recent changes in the competitive area/environment you now need to choose a carrier to carry calls you make to * cities in nearby communities/locations.

Southern Bell will be happy to continue to handle your calls for you.

I also have a list of other companies who can carry these calls. Would you like me to read the list to you?

Use this table to determine action to take.

If customer responds . . .	Then you will . . .	And . . .
Yes	Read names of available carriers	enter/select chosen carrier for order
No	Thank customer for allowing us to be carrier of choice	populate/select BST LPIC of 0377 & LPCA of "BO" (bus ofc)
I'm not sure	Explain that we will carry calls to nearby communities until notified of any change in customer's choice.	populate/select BST LPIC of 0377 and LPCA of "UN" for undecided and advise no charge will apply for order issued to designate initial PIC selection
What is volume	Explain volume discounts	populate/select customer's choice of carrier

*Nearby communities/locations are defined as calls made outside of the local call area.

Following are some guidelines to which we will adhere:

- Never provide information about a particular carriers' services, rates or other information which could influence customer's choice.
- Do not express preference for one carrier over another.
- Do not discuss vertical services at same time you are discussing intraLATA.

Listed below are example and non-example situations.

- EXAMPLE Customer asks, "Who has the lowest rates?" SR must advise that he/she does not know this information.
- NON-EXAMPLE Customer requests rate comparison information. SR states that the TV commercial mentioned that South Coast was lots cheaper than Dynamics.
- EXAMPLE Customer asks, "Who do you recommend?" SR responds that he/she can not offer any recommendations.
- NON-EXAMPLE Customer asks, "Who do you use?" SR responds, "AT&T".
- EXAMPLE Now that we have finished discussing your call arrangements let's get a telephone number for you.
- NON-EXAMPLE SR says "Let's go ahead and choose your community carrier while you're thinking about your decision on the other calling features."

Existing customers can call us or one of the carriers. When they call us we should use the following chart to decide what action to take.

If customer request is . . .	Then you will . . .	Then . . .
Generic	Explain to the customer he/she has choice of carriers.	Issue order with selected choice.
Keep BST	Review _____ to see if NPA NXX already converted.	
	-----	-----
	If NPA NXX has converted . . .	Issue "R" order. Change LPCA from "DF" to "BQ"
	-----	-----
	If NPA NXX has not converted . .	Issue ??????
LPIC for Specific Carrier	Explain he/she has choices. Explain BST offers service.	Issue order with selected choice.
For List of Carriers	Refer customer to ??????	XXXXXX

PRESUBSCRIPTION
CUSTOMER CONTACT SCRIPTS
INTERLATA ENVIRONMENT DISCLOSURE STATEMENTS
CURRENT WORDING
IPOS
INDEPENDENT PAYPHONE PROVIDERS

The information exhibited in the Customer Operations Units section of this document beginning on COU INTER Page 1 is also used in the IPP Center for InterLATA customer contacts. Please reference that section of the document for details.

BELLSOUTH

INTRALATA PRESUBSCRIPTION

CUSTOMER CONTACT INFORMATION

IPCS

INTERCONNECTION

EQUAL ACCESS SERVICE CENTER

EASC INTRA Page 1

Revised June 7, 1995

UNAUTHORIZED PIC SCRIPT
(Draft)

Following is the suggested script that will be used when a customer calls in claiming an unauthorized change in their carrier for IntraLATA calls:

Rep: BellSouth Equal Access Service Center, this is Jane Smith, how may I help you?

Customer advises that he/she is subscribed to Carrier XYZ incorrectly.

Rep: Mr./Mrs. Customer, I will be glad to assist you. What is your name, area code and telephone number?

Customer responds appropriately.

(The Rep accesses the customer's record to verify the PIC).

Rep: Mr./Mrs. Customer I have accessed your record. We show that an order was placed on your behalf by XYZ company indicating service was negotiated with them to handle your long distance calls to nearby communities inside of the South Central/Southern Bell calling area on (PCA Date). I have some questions to ask you for clarification.

Ask questions similar to the following:

- Did you request this change?
- Have you talked to anyone with XYZ company?
- Have you received any correspondence from XYZ company concerning a change to your service?

Customer responds appropriately.

Rep: I will be happy to change you back to your previous carrier at no charge to you. Mr./Mrs. Customer you have two options (only if Carrier participates in Expedited PIC Switchback) available to you.

EASC INTRA Page 2

Expedited PIC Switchback where applicable

We can credit the previous PIC change charge on your next month's bill and bill XYZ company appropriately.

Or

We can initiate an investigation and request proof of authorization which will take approximately six to eight weeks. At the end of this time should XYZ company provide some type of authorization, we will mail this information to you for validation. Should you dispute the validity, we will credit you the PIC change charge and bill XYZ company appropriately. If you do not dispute the validity, we will bill you the PIC change charge that was waived when we changed you back to your previous carrier.

Customer replies appropriately.

Rep: Mr./Mrs. Customer we will issue an order due today to change you back to your previous carrier. Is there anything else I can help you with today?

Customer replies appropriately.

Rep: Thank You for calling BellSouth Equal Access Service Center.

EASC INTER Page 1

Revised June 7, 1995

UNAUTHORIZED PIC SCRIPT

Following is the script that is used today when a customer calls in claiming an unauthorized change in their carrier for InterLATA calls:

Rep: BellSouth Equal Access Service Center, this is Jane Smith, how may I help you?

Customer advises that he/she is subscribed to Carrier XYZ incorrectly.

Rep: Mr./Mrs. Customer, I will be glad to assist you. What is your name, area code and telephone number?

Customer responds appropriately.

(The Rep accesses the customer's record to verify the PIC).

Rep: Mr./Mrs. Customer I have accessed your record. We show that an order was placed on your behalf by XYZ company indicating service was negotiated with them to handle your long distance calls outside of the South Central/Southern Bell calling area on (PCA Date). I have some questions to ask you for clarification.

Ask questions similar to the following:

- Did you request this change?
- Have you talked to anyone with XYZ company?
- Have you received any correspondence from XYZ company concerning a change to your service?

Customer responds appropriately.

Rep: I will be happy to change you back to your previous carrier at no charge to you. Mr./Mrs. Customer you have two options (only if Carrier participates in Expedited PIC Switchback) available to you.

EASC INTER Page 2

Expedited PIC Switchback where applicable

We can credit the previous PIC change charge on your next month's bill and bill XYZ company appropriately.

Or

We can initiate an investigation and request proof of authorization which will take approximately six to eight weeks. At the end of this time should XYZ company provide some type of authorization, we will mail this information to you for validation. Should you dispute the validity, we will credit you the PIC change charge and bill XYZ company appropriately. If you do not dispute the validity, we will bill you the PIC change charge that was waived when we changed you back to your previous carrier.

Customer replies appropriately.

Rep: Mr./Mrs. Customer we will issue an order due today to change you back to your previous carrier. Is there anything else I can help you with today?

Customer replies appropriately.

Rep: Thank You for calling BellSouth Equal Access Service Center.

BELLSOUTH

INTRALATA PRESUBSCRIPTION

CUSTOMER CONTACT INFORMATION

IPOS

OPERATOR SERVICES

CUSTOMER CONTACT SCRIPTS

INTRALATA ENVIRONMENT

OTS CALL EXAMPLES

CALL 4

0-Coin/NCN/Cellular

CUST: "I want to make a call, connect me to XXX (a participating OTS carrier).

Operator transfers the call to the requested carrier and does not screen to determine if the call is an intraLATA call.

0-

CUST: "I want to place a call to (Columbus, GA)."

OPER: "What is the number, please?"

CUST: (Provides number to an intraLATA point)

Operator completes the call.

CALL 6

0-

CUST: "Operator, I want to place a conference call."

OPER: "I'm sorry, you will need to call the conference provider of your choice."

CUST: "OK, thanks."

CALL 14
0-

CUST: "What is XXX's (IC) access code?" (Carrier subscribes to
OTS.)

OPER: "I'll be glad to transfer you to XXX. Just one moment."

Operator transfers to requested carrier.

CALL 15
0-

CUST: "What is carrier BBB's access code?" (Carrier does not
subscribe to OTS.)

OPER: "I'm sorry I do not have that information. Please
contact BBB's customer service number for that
information."

CUST: "OK, thanks."

CALL 16
0+

CUST: "This is a collect call, my name is Susie."

OPER: "Thank you."

Operator processes the collect call as usual. The number rings 5 - 6
times.

OPER: "There is no answer. Please try your call later."

CUST: "Try another number for me. It's in New York."

OPER: "I'm sorry, that is not a Southern Bell call. Which
carrier would you like to use?"

CUST: "YYY." (Carrier subscribes to OTS.)

Operator erases the first intraLATA number and connects the customer to
the requested carrier.

CALL 18
0-

CUST: "I reached a wrong number calling XXX XXX XXXX(an
intraLATA point). Can you give me credit?"

OPER: "I'm sorry you had trouble. I'll give you credit if
your call was placed through Southern Bell. Would you
like to redial your call?"

CUST: "Yes, thanks."

If the customer indicates the call was placed by an OTS participating
carrier, offer to transfer to the carrier. If the customer indicates
the call was placed by a non-participating OTS carrier, refer to the
carrier's customer service number.

CALL 19
0- COIN

CUST: "I reached a wrong number calling XXX XXX XXXX(an
intraLATA call) and the telephone kept my money."

OPER: "I'm sorry you had trouble. What company processed your
call?"

CUST: "Southern Bell."

OPER: "Thank you, I'll give you credit and reconnect your
call."

Operator gives equivalent service (one minute credit) and places the
call.

If the customer indicates the call was placed by an OTS participating
carrier, offer to transfer to the carrier. If the customer indicates
the call was placed by non-participating OTS carrier, refer to the
carrier's customer service number.

If the customer does not know what company placed the call, the
operator should provide one minute credit for the initial period and
process the call. The customer will be advised that Southern Bell is
providing this service.

PRESUBSCRIPTION
CUSTOMER CONTACT SCRIPTS
INTERLATA ENVIRONMENT DISCLOSURE STATEMENTS
CURRENT WORDING
OPERATOR SERVICES

OTS CALL EXAMPLES

CALL 1 (0-COIN)

OPER: "Southern Bell, may I help you?"

CUST: "I reached a wrong number calling 2120897-4783 and the phone did not return my money." (If number is keyed IC will display.)

OPER: "I'm sorry, that is not a Southern Bell call. I will transfer you to an operator who can assist you."

Enter IC + 288 + START + POS RLS

If AT&T does not subscribe to OTS:

OPER: "I'm sorry, that is not a Southern Bell call. For assistance, please dial 102880."

After customer acknowledges, press CA CALL and POS RLS.

Call 2 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "I want to place a call to Seattle, Washington."

OPER: "I'm sorry, that is not a Southern Bell call. Which interexchange Carrier would you like to use?"

CUST: "I would like to use XXX." (Customer selects a non-participating IC.)

OPER: "I'm sorry, XXX does not participate in our operator transfer service. Please contact them directly by calling their customer service number."

CUST: "Do you have the number?"

OPER: "You may obtain the number from Directory Assistance (411)."

CUST: "Thank you."

OPER: "You're welcome." Press POS RLS.

Call 3 (0-HOTEL)

OPER: "Southern Bell, may I help you?"

CUST: "I want to place a call to 313-643-7234." (If number is keyed IC will display.)

OPER: "I'm sorry, that is not a Southern Bell call. Which Interexchange Carrier would you like to use?"

CUST: "I don't know."

OPER: "I can connect you to XXX, YYY, or CCC. Which would you prefer?"
(Operator must read all participating carriers on the list.)

CUST: "Connect me to YYY."

OPER: "Just a moment, I'll connect you."
Press IC + (IC code) + START + POS RLS.

Call 4 (0-COIN)

OPER: "Southern Bell, may I help you?"

CUST: "I want to make a collect call, connect me to XXX (an IC carrier)."

OPER: "What Area Code and number are you calling?"

CUST: "XXX-XXX-XXXX."

OPER: "Enter XXX-XXX-XXXX + START. (Call is IntraLATA.)
"This is a Southern Bell call. I'll be glad to assist you. May I have your name please?"

CUST: "Sandy Stone."

OPER: "Thank you." Complete the call as usual.

Call 5 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "How much is a call to New York?"

OPER: "I'm sorry, that is not a Southern Bell call. Which Interexchange Carrier would you like to use?"

CUST: "XXX." (Customer selects participating carrier.)

OPER: "One moment please, I'll be glad to transfer you." Press IC + (IC code) + START POS RLS.

Call 6 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "Operator, I want to place a conference call."

OPER: "I'm sorry, you will need to call the conference provider of your choice."

CUST: "Thank you."

OPER: "You're welcome." Press CA CALL and POS RLS.

Call 7 (0-Screen 79 Cellular Mobile)

OPER: "Southern Bell, may I help you?"

CUST: "Connect me to CCC."
(Customer requests a carrier subscribed to OTS.)

OPER: "What area code and number are you calling?"

CUST: "XXX-XXX-XXXX."

OPER: "Enter XXX-XXX-XXXX + START. (IC displays.)
"One moment, I'll be glad to transfer you." Press IC + (IC code) +
START + POS RLS.

Call 8 (Screen Code 88)

OPER: "Southern Bell, may I help you?"

CUST: "I reached a wrong number on a call to New Jersey. I deposited
\$1.85, can you return my money?"

OPER: "I'm sorry, that is not a Southern Bell call. Please check the
instruction card on the telephone for information concerning how to
obtain a refund."

CUST: "There is no instruction card here."

OPER: "I'm sorry, please dial "00" for further assistance."

CUST: "Thank you."

OPER: "You're welcome." Press CA CALL and POS RLS.

Call 9 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "I'm blind, can you assist me on a call to San Diego, California?"

OPER: "I'm sorry, that is not a Southern Bell call. Which Interexchange Carrier would you like to use?"

CUST: "ZZZ" (Carrier subscribes to OTS.)

OPER: "One moment, please. I'll be glad to transfer you." Press IC + (IC code) + START + POS RLS.

Call 10 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "I want to make a collect call to Mexico"

OPER: "I'm sorry, that is not a Southern Bell call. Which Interexchange Carrier would you like to use?"

CUST: "I don't know."

OPER: "I can transfer you to XXX,YYY or CCC. Which do you prefer?"

CUST: "Connect me to the cheapest one."

OPER: "I'm sorry, we do not have access to carrier rate information. I can transfer you to XXX,YYY or CCC. Which do you prefer?"

CUST: "Just connect me to the one you would use."

OPER: "I'm sorry, it will be necessary for you to select a carrier or dial "00."

CUST: "I don't know anything about carriers."

OPER: "Just one moment, I'll connect you to my supervisor."

Supervisor Note:

Advise the customer we do not have access to carrier rate information and it will be necessary for him/her to select a carrier. If the customer refuses to select a carrier, advise that you will be unable to complete a transfer and refer the customer to "00."

Call 11 (0-Coin Ind)

OPER: "Southern Bell, may I help you?"

CUST: "What do I dial to make a calling card call to London, England?"

OPER: "I'm sorry, that is not a Southern Bell call. Which Interexchange Carrier would you like to use?"

CUST: "XXX." (Carrier subscribes to OTS.)

OPER: "One moment, please. I'll be glad to transfer you."

Press IC + (IC code) + START + POS RLS.

Call 12 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "I was cut off on a call to Dallas, Texas."

OPER: "I'm sorry, that is not a Southern Bell call. Which carrier did you use to place your call?"

CUST: "BBB." (Carrier does not subscribe to OTS.)

OPER: "Please call BBB's customer service number for further assistance."

CUST: "Thank you."

OPER: "You're welcome." Press CA CALL and POS RLS.

Call 13 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "(Customer crying, extremely upset.)

"My child has been hurt and I'm trying to call my husband in Washington, DC. Please help me! Hurry!"

OPER: "I'm sorry that is not a Southern Bell call. Which carrier would you like to use?"

CUST: "I don't care. This is an emergency!"

OPER: (Connect to first IC on list).

"I will need to transfer you to another operator and my equipment will not allow me to stay on the line. Please advise the other operator you have an emergency."

CUST: "You're welcome. One moment, please." Press IC + (IC code) + START + POS RLS.

Call 14 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "What is XXX's (IC) access code?" (Carrier subscribes to OTS.)

OPER: "I'll be glad to transfer you to XXX. Just one moment."

CUST: "Thank you."

OPER: "Have a good day." Press IC + (IC code) + START + POS RLS.

Call 15 (0+)

OPER: "Southern Bell, may I help you?"

CUST: "This is a collect call, my name is Susie."

OPER: "Thank you." Enter correct class charge Number rings five- six times.

CUST: "Try another number for me. It's in New Orleans."

OPER: "I'm sorry, that is not a Southern Bell call. Which Intarexchange Carrier would you like to use?"

CUST: "YYY." (Carrier subscribes to OTS.)

OPER: "One moment, please. I'll be glad to transfer you."
Press CLD + START to erase the intraLATA number. Press IC + (IC code)
+ START + POS RLS.

Call 16 (0-)

OPER: "Southern Bell, may I help you?"

CUST: "I need Directory Assistance in Dallas, Texas."

OPER: "I'm sorry, that is not a Southern Bell call. What carrier would you like to use?"

CUST: "XXX." (Customer selects a nonparticipating carrier.)

OPER: "I'm sorry, XXX does not participate in our operator transfer service. Please call their customer service number for assistance."

CUST: "OK."

BELLSOUTH

INTRALATA PRESUBSCRIPTION

CUSTOMER CONTACT INFORMATION

NETWORK

Background

The attached information provides Contact Personnel with various Questions and Answers regarding 1+ IntraLATA Presubscription filings.

- Description
- (Q1) My customers have been reading about 1+ IntraLATA Presubscription in the papers. What is it?
- (A1) During the 4th quarter of this year, Florida and Kentucky customers will have a choice as to who carries their IntraLATA long distance calls.
- (Q2) Will this become available to all Florida and Kentucky customers at the same time?
- (A2) No, implementation will begin in the 4th Quarter of this year and must be completed by December 31, 1997.
-

PIC

- (Q1) Does this mean there will be a PIC for IntraLATA and for InterLATA.
- (A1) Yes, customers will be able to choose their IntraLATA carrier. BellSouth will have a PIC code to be used for IntraLATA, only.
- (Q2) Will we be able to promote BellSouth to our customers?
- (A2) This decision has not yet been made. Several scenarios are being addressed and Contact Personnel will be advised how to handle the two PIC environment in the next few months.
-

Presubscription IntraLATA
Customer Contact Scripts

IntraLATA Environment Wording

INTRALATA

CARRIERS/REPAIRS SERVICE INQUIRIES STATEMENTS

When a request is received from a Carrier/Repair Service personnel for Toll Restrictions information, the Contact Personnel will review the subscriber's records for the Toll Restriction USOCs and provide the following answer:

"Yes, the subscriber has ordered a service for Toll Restriction"

OR

"No, the subscriber's line is not Toll Restricted."

If the Carrier/Repair service asks if a line is restricted for intraLATA service the Contact Personnel may use the following statement:

"Yes, the subscriber has ordered a service that will restrict intraLATA calling."

OR

"No, the subscriber has not ordered a service that will restrict intraLATA calling." If the Carrier/Repair Service requests any other information concerning the subscriber's Toll Restriction service, it must be explained that the Carrier/Repair Service must contact the subscriber for additional information.

NOTE:

The Contact Personnel must verify that the Carrier/Repair Service personnel making the request is the Carrier on the subscriber's record.

OPTIONAL SERVICES

FULL DISCLOSURE STATEMENTS ARE REQUIRED IN CONNECTION WITH THE RECOMMENDATION OR SALE OF ALL OPTIONAL SERVICES.

OPTIONAL SERVICES ARE DEFINED AS ANYTHING BEYOND THE ACCESS LINE, CALC AND OTHER APPLICABLE MANDATORY CHARGES.

WHILE CALLING CARDS HAVE NO MONTHLY RATE OR CONNECTION CHARGE, THEY MUST BE NEGOTIATED WITH THE CUSTOMER AND THE APPLICABLE POINTS OF FULL DISCLOSURE COVERED.

CONTACT PERSONNEL MUST:

1) Clearly communicate to customers the optional nature of each optional service that is recommended ordered.

- 2) Provide a clear description of each optional service recommended or ordered.
- 3) Provide the rate charged for each optional service recommended or ordered.
- 4) Make sure the customer understands that optional services are not required to obtain basic telephone service.
- 5) Make sure the customer understands that optional services can be canceled at any time without a cancellation charge.
- 6) (SERVICE PLANS ONLY) Advise there are exclusions which will be detailed on the first bill. Cover the exclusions if requested by the customer.

*THESE PROCEDURES APPLY IN ADDITION TO ANY REQUIREMENTS MANDATED IN YOUR STATE.

There's a simple solution to meeting these guidelines:

- Be straightforward and totally honest with every customer
- Promise only what you can honestly deliver

OPENING STATEMENT

"Mr. Customer, we have a Service Plan which provides for our determining whether a telephone service problem is with your inside wiring or jacks or with and individual set. The Service Plan provides for Southern Bell/South Central Bell to maintain or repair all inside telephone wiring associated with basic services excluding damage caused by fire, acts of God, riots, acts of war, gross negligence, willful damage, vandalism or wire not meeting Southern Bell's/South Central Bell's technical standards or installation guidelines. The Service Plan does not cover repair of telephone equipment. The plan is optional. You may choose to maintain the inside wiring and jacks yourself. The charge for the plan is \$_____ a month. Would you like me to order the Plan for you?"

CLOSING STATEMENT

"Thank you for subscribing to the Service Plan. You will receive on your telephone bill a statement outlining the terms and conditions of the Service Plan. Please review the statement and if you agree to such terms and conditions, then pay the charge. Payment will indicate your acceptance of the terms and conditions for the Service Plan."

INTERLATA PRESUBSCRIPTION
NETWORK

CARRIERS/REPAIRS SERVICE INQUIRIES STATEMENTS

When a request is received from a Carrier/Repair Service personnel for Toll Restrictions information, the Contact Personnel will review the subscriber's records for the Toll Restriction USOC's and provide the following answer:

"Yes, the subscriber has ordered a service for Toll Restriction" OR "No, the subscriber's line is not Toll Restricted."

If the Carrier/Repair service asks if a line is restricted for interLATA service the Contact Personnel may use the following statement:

"Yes, the subscriber has ordered a service that will restrict interLATA calling." OR "No, the subscriber has not ordered a service that will restrict interLATA calling." If the Carrier/Repair Service requests any other information concerning the subscriber's Toll Restriction service, it must be explained that the Carrier/Repair Service must contact the subscriber for additional information.

NOTE:

The Contact Personnel must verify that the Carrier/Repair Service personnel making the request is the Carrier on the subscriber's record.

OPTIONAL SERVICES

FULL DISCLOSURE STATEMENTS ARE REQUIRED IN CONNECTION WITH THE RECOMMENDATION OR SALE OF ALL OPTIONAL SERVICES.

OPTIONAL SERVICES ARE DEFINED AS ANYTHING BEYOND THE ACCESS LINE, CALC AND OTHER APPLICABLE MANDATORY CHARGES.

WHILE CALLING CARDS HAVE NO MONTHLY RATE OR CONNECTION CHARGE, THEY MUST BE NEGOTIATED WITH THE CUSTOMER AND THE APPLICABLE POINTS OF FULL DISCLOSURE COVERED.

CONTACT PERSONNEL MUST:

- 1) Clearly communicate to customers the optional nature of each optional service that is recommended ordered.
- 2) Provided a clear description of each optional service recommended or ordered.

- 3) Provide the rate charged for each optional service recommended or ordered.
- 4) Make sure the customer understands that optional services are not required to obtain basic telephone service.
- 5) Make sure the customer understands that optional services can be canceled at any time without a cancellation charge.
- 6) (SERVICE PLANS ONLY) Advise there are exclusions which will be detailed on the first bill. Cover the exclusions if requested by the customer.

*THESE PROCEDURES APPLY IN ADDITION TO ANY REQUIREMENTS MANDATED IN YOUR STATE.

- There's a simple solution to meeting these guidelines:
- Be straightforward and totally honest with every customer
 - Promise only what you can honestly deliver

OPENING STATEMENT

"Mr. Customer we have a Service Plan which provides for our determining whether a telephone service problem is with your inside wiring or jacks or with and individual set. The Service Plan provides for Southern Bell/South Central Bell to maintain or repair all inside telephone wiring associated with basic services excluding damage caused by fire, acts of God, riots, acts of war, gross negligence, willful damage, vandalism or wire not meeting Southern Bell's/South Central Bell's technical standards or installation guidelines. The Service Plan does not cover repair of telephone equipment. The plan is optional. You may choose to maintain the inside wiring and jacks yourself. The charge for the plan is \$_____ a month. Would you like me to order the Plan for you?"

CLOSING STATEMENT

"Thank you for subscribing to the Service Plan. You will receive on your telephone bill a statement outline the terms and conditions of the Service Plan. Please review the statement and if you agree to such terms and conditions, then pay the charge payment will indicate your acceptance of the terms and conditions for the Service Plan."

EXHIBIT B

**INFORMATION PROVIDED BY BELLSOUTH DURING
KENTUCKY PSC PROCEEDING ON FEBRUARY 15, 1996**

Kentucky PSC Data Request
Oral Requests From The Hearing Dated February 15, 1996
February 29, 1996
Item No. 1
Page 1 of 1

REQUEST: Provide an updated copy of On-Line Documentation, used by the BellSouth Business Office representatives, for use in discussions with customers relative to IntraLATA Presubscription.

RESPONSE: See attached.

Exhibit 1

Overview (GA,KY)

Toll Calls dialed as 1+ or 0+ within the intraLATA calling zone were previously carried by the local exchange companies ie. BellSouth. To place calls using another carrier it was necessary to dial that carrier's access code.

On 12/29/94, the first Public Service Commission (PSC) order requiring the local exchange companies to provide other carriers equal access for intraLATA toll without the use of an access code was issued in Kentucky. Similar orders were also issued by the PSC staffs in Florida and Georgia.

Note: BellSouth has decided to use the term ALocal Toll@ when referring to intraLATA service

Search	Repeat Search	Prior Topic
--------	---------------	-------------

PSC Order Presubscription Guidelines (GA,KY)

The PSC orders include the following presubscription guidelines for implementation of local toll presubscription:

- Local Exchange companies will be required to advise ONLY new customers of other companies who carry Local Toll calls.
 Note: An existing customer may change Local Toll carriers by contacting their carrier of choice.
- Existing customers will not be balloted. They will be assigned to the local exchange company until they initiate a change of carriers.
- 4 party line Local Toll calls must be carried by the local exchange company and
- A new service choice of undecided will default to the local exchange company.

Customer Options

In states where PSC orders have been issued, customers will have the options of selecting an IntraLATA , as well as, an InterLATA carrier.

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Customer Options

In states where PSC orders have been issued, customers will have the options of selecting an IntraLATA , as well as, an InterLATA carrier.

The customer may select:

- the same carrier for each service or
- a different carrier for each service.

Conversion Processes for Local Toll (GA,KY)

Introduction

Prior to customers being able to choose a carrier to handle their Local Toll calls, several different conversion activities must take place.

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Network Switch Conversion

Network switches for selected NPA/NXX*s will convert to Local Toll equal access weekly.

The conversions will take place on Sundays.

The conversion process will continue until the entire state is converted.

This process could take up to two years per state.

The conversion start dates are as follows:

**** RESIZE THIS CHART ****

State	Date
Kentucky	10/22/95
Georgia	12/03/95
Florida	Unknown
Other States	Dates to be announced per PSC orders

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New Codes

The following new codes will become effective with each NPA/NXX conversion:

- LPIC - used to reflect the presubscribed interexchange carrier selection and
- LPCA - used to indicate the presubscribed carrier arrangement.

BellSouth LPIC

The BellSouth LPIC is 0377.

Code Sets for LPCA

Two new code sets for LPCA will be added with each conversion:

- UN - is used to denote undecided.

Note: A selection of undecided is only applicable as an initial selection when the customer establishes new service and can not decide on a carrier. When this situation occurs assign the BellSouth LPIC of 0377 and a LPCA of UN.

- DF - is used to denote default to BellSouth.

Note: The code sets BO and FR apply per existing PCA procedures.

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Note: There is no LPIC NONE condition with Local Toll. The local exchange company is the default carrier.

Other LPCA Code Sets

Other LPCA code sets input by various groups other than Service Representatives may appear on the customer record.

The code sets are:

**** RESIZE THIS CHART ****

Codeset	Definition
CL	Carrier List
CM	Carrier Mechanized
CP	Carrier Paid - Mechanized
CV	Carrier Verbal - EASC use only
DF	Default - IntraLATA Conversion

Codeset chart cont.

**** RESIZE THIS CHART ****

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Codeset	Definition
EA	Equal Access
EB	Electronic Bonding
EP	Electronic Bonding (carrier paid for change)
ES	Expedited Switchback - EASC only
MG	Merger (replaces CL, CM, & MR)
MR	Manual Resolution

Codeset chart cont.

**** RESIZE THIS CHART ****

Codeset	Definition
RT	Right Touch
SE	System External Administrative Management Service (AMS)
SF	Expedite LPIC Switchback -This is a FREEZE code
SI	System Internal Administrative

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**** RESIZE THIS CHART ****

Codeset	Definition
RT	Right Touch
SE	System External Administrative Management Service (AMS)
SF	Expedite LPIC Switchback - This is a FREEZE code
SI	System Internal Administrative
SR	Submitted Reseller
UF	UPIC - this is a FREEZE code (used by EASC only)

RNS Enhancements

As each NPA/NXX converts, RNS will be enhanced to provide the list of interexchange presubscribed carriers in random order.

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CRIS & SOCS Conversions

CRIS & SOC*s will perform database conversions to add the BellSouth LPIC and default LPCA to embedded base records and pending orders.

The conversions will take place at the end of each month.

Note: Because the Network switch conversions may take place at various times of the month, customer records, as well as, pending orders will not reflect the LPIC information even though the Network switch conversion for that NPA/NXX has taken place. The LPIC information will not be visible until after the CRIS & SOCs conversion at the end of the month.

SOER Edit

A SOER edit requiring the SR to select the LPIC and a LPCA once a NPA/NXX has converted will be put in place.

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The customer's LPIC should be 0377 (BellSouth) and the LPCA should be DF (default) unless a change of carrier is/has been initiated.

The edit condition will exist:

- If the order is issued on or after the NPA/NXX conversion date and
- on all orders with inward activity.

Note: RNS will be enhanced to prompt when the edit condition exists.

Customer Contacts for Local Toll (GA,KY)

Introduction

With the implementation of Local Toll presubscription, some customer contact procedures will change.

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New Customers

New customers MUST be advised they have a choice of carriers for their Local Toll calls.

Disclosure Statements

The disclosure statements to new customers do not have to be verbatim but, must include:

- advise that other carriers are available
- an offer to read the list of available carriers and
- a statement advising the customer that BellSouth also provides the service.

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The following are example of disclosure statements:

- Mr/Mrs Customer, due to the new competitive environment we are entering, you are now required to select a long distance carrier for the Local Toll calls, calls made within your calling zone to nearby communities. I will be glad to advise you of the carriers available, BellSouth is one of these carriers.
 - Mr/Mrs. Customer, you are now required to select a company to handle long distance calls made within your LATA, as well as calls made outside your calling LATA. BellSouth would like to be your Local Toll provider for the calls within your calling LATA. We have been handling these type calls for you in the past. Other carriers do offer this service, I will be glad to advise you of the carriers available, or I can make arrangements for BellSouth to be your carrier of choice.
-

T Order Customers

On all T orders we will advise customers they have a choice as to who carries their 1+ Local toll calls.

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T Order Customers

On all T orders we will advise customers they have a choice as to who carries their 1+ Local toll calls.

Note: RNS will display the existing carrier of choice under current services. Unless a different carrier is selected, the carrier shown will be retained on the T order.

On Line Transfer

If the Local Toll and InterLATA carrier choices are the same and the carrier participates in on-line transfer, follow existing **on-line transfer** procedures.

If both carrier choices are not the same do not offer to on-line transfer. Instruct the customer to contact each carrier.

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If BellSouth is the only Local Toll carrier and the InterLATA carrier is the same on all lines, and the carrier participates in on-line transfer, follow existing on line transfer procedures.

Note: RNS will provide the SR with an OLT message, as well as, the company name and number when it is appropriate to offer on line transfer.

Non- Negotiate

If the Local Toll carrier is non-negotiate follow existing equal access procedures for non-negotiate.

LPIC Change Requests

When an existing customer calls the Service Center to request a change of carrier only, he/she should be referred to the carrier of choice to place their order.

The customer should be advised that the carrier of choice needs to establish an account for him/her, and provide information about the service.

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Note: If a customer insists that we issue his/her order, we should issue the order and advise that they still need to contact the carrier to establish an account.

Note: Read the list of carriers only if the customer request.

The customer should also be referred to the carrier to update, change or inquire about their pending mechanized LPIC order.

If the customer's request is for other order activity ie. a T&F and they initiate a change of carrier, select the customer's choice on the service order and refer the customer to the carrier for notification. Follow **on-line transfer** guidelines.

Carrier Information Requests

Requests for carrier information such as rates, calling plans, access codes, etc., should be referred to the carrier.

Unchanged Equal Access Procedures

Several existing unchanged equal access procedures also apply to Local Toll. The procedures include the handling of:

- referral of **unauthorized PIC** changes to the Equal Access Service Center (EASC)

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Note: A new BOCRIS LPIC History screen is accessed by entering LPIC in the BOCRIS command field and depressing F4.

- **non-listed/non-published disclosure**
- **PIC verification**
- **bill adjustments**
- **social security number consent** and
- **dialing instructions**

Local Toll Change Charges

Introduction

Customers may change carriers for several different reasons. If change charges are not paid by the carrier, the end user is billed.

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LPIC Change Charge

A LPIC change charge of \$1.49 per line applies each time the LPIC is changed with the exception of a change from "UN" (undecided) to a carrier.

There is no charge to change from UN to a carrier.

The LPIC change charge is in addition to charges billed for InterLATA (PIC) changes.

Note: The CRIS billing system will automatically apply the LPIC change charge when applicable.

Other LPIC Change Charge

Orders issued for other work may also incur the LPIC change charge.

Examples of orders written for other work where LPIC change charge applies include:

- a change of LPIC on a regrade of a 2 party line to an individual line (regrade charges may also apply) and
- change of a carrier on a **transfer of contract** order.

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Order Issuance for Local Toll

Introduction

RNS will be enhanced to support conversion and ongoing order activity including adding Local Toll companies to the Order Control Panel pull down list.

Service Order Effective Date

Service orders to change or add a Local Toll carrier can not be issued prior to the Network switch NPA/NXX conversion date.

Note: The other Local Toll carriers must abide by this same rule.

3270 LPIC Order Entry

For instances where it is necessary to enter LPIC via the 3270 the order entry is:

****** RESIZE THIS CHART ******

I1 1FR/PIC XXXX/PCA XX, mm dd yy
/LPIC XXXX/LPCA XX, mm dd yy

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Waive LPIC Charges

In instances where it is necessary to waive LPIC charges via the 3270, the billing instruction entry is

IBI WIPC

Note: This exhibit is not intended to be all inclusive. All other service order entries are the same as those used for PIC.

Due Date Interval

The due date interval for LPIC is the same as it is for PIC.

HOW TO GET HELP

When help is needed, use the following chart:

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If question concerns...	Then press...
Document Format	QAG
Document Content	SME
System Performance Problems	RTOC

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**** RESIZE THIS CHART ****

If question concerns...	Then press...
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