

Nancy B. White
General Counsel - FL

BellSouth Telecommunications, Inc.
150 South Monroe Street
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(305) 347-5558

April 18, 2003

Mrs. Blanca S. Bayó
Director, Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

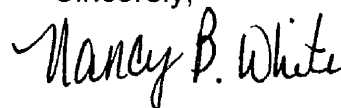
Re: **Undocketed Matter: Unlimited Answers Plan Promotion**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for BellSouth's response to the Florida Public Service Commission's request on Unlimited Answers Plan Promotion, which we ask that you file in the captioned undocketed matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return a copy to me.

Sincerely,



Nancy B. White (KA)

Enclosures

cc: Jacquelyn Gilchrist
Marshall M. Criser III
R. Douglas Lackey

DOCUMENT NUMBER DATE

03589 APR 18 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Unlimited Answers Plan Promotion)
_____)

Undocketed
Filed: April 18, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF
INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files this Notice of Intent to Request Specified Confidential Classification and states the following:

1. On March 28, 2003, the Florida Public Service Commission (the "Commission"), requested that BellSouth provide certain information on the Unlimited Answers Plan Promotion. This information is being provided in connection with the Commission's request.

2. The information contained in BellSouth's response contains confidential information that is proprietary to BellSouth.

3. Because this information is proprietary, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of the documents without delay.

4. The original of this notice has been filed with the Division of Records and Reporting.

Respectfully submitted this 18th day of April, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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R. Douglas Lackey

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REQUEST: Attached is the above referenced letter from BellSouth introducing the BellSouth Unlimited Answers Plan Promotion. Is the \$49.99 monthly fee referenced in your local exchange tariff? Is so, where? If not, why not?

RESPONSE: No, the Complete Choice Service is in the local exchange tariff and the two BellSouth Long Distance promotions are in BellSouth Long Distance's long distance tariffs. "BellSouth Unlimited Answers Plan" is not filed in a single tariff, but is the name chosen for a bundle of local and toll services.

The \$49.99 represents the combined price for jointly marketed BellSouth ("BST") local exchange services and BellSouth Long Distance interstate and intrastate long distance services. The tariff references and related prices are below:

<u>BellSouth Telecommunications, Inc</u> Complete Choice® Service Florida GSST A3.4.3, Twelfth Revised Page 24	\$30.00
<u>BellSouth Long Distance, Inc</u> BellSouth® Unlimited Talk Plan Promotion Florida P.S.C. Tariff No. 2, Section 5.15, Original Page 227.2, Promotion No. 14	\$ 9.24
BellSouth Unlimited Talk Plan Promotion FCC Residence Services Pricing and Service Guide, Section 7.13, Promotion No. 12	<u>\$10.75</u>
Total	\$49.99

Note that the BellSouth Long Distance Unlimited Talk Plan Promotion in the Florida P.S.C Tariff has been replaced by the 1st Revised Page 227.2, which contains non-rate affecting modifications to the promotion as originally filed.

REQUEST: The coupon associated with the Unlimited Answers Plan Promotion states that orders placed between February 15 and May 15, 2003, for BellSouth ("BST") local phone service qualify for this promotion. According to T-030132, first revised page 35.5.2.16, the effective date is February 20, 2003. Please explain why the dates differ.

RESPONSE: The \$75 Cash Back Promotion is associated with BellSouth Complete Choice and BellSouth Preferred Pack. The cash-back promotion was created with a 2/15/03 effective date. Due to miscommunication between the various BellSouth teams involved in the filing, the change in the effective date from 2/15/03 to 2/20/03 was not incorporated in the promotion collateral or operations. To prevent this from occurring again, a new process to verify promotion start dates is being established between the corporate filing team and the marketing group.

REQUEST: The language stated on the coupon associated with the Unlimited Answers Plan Promotion may be inconsistent with the language stated in your exchange tariff. The coupon states that cancelled orders are not eligible for any cash-back offer, whereas the language in T-030132 states that customers that have not had service with BellSouth within the last 17 days qualify. Please clarify and, in particular, explain what constitutes a "cancelled order" for purposes of the coupon.

RESPONSE: The language contained in the \$75 Cash-Back Coupon stating "[C]ancelled orders are not eligible for any cash-back offer" refers to eligibility for the cash-back offer once the customer has accepted the offer and agreed to return his service to BellSouth. If the customer cancels his order (e.g. cancels the service that qualified them for the cash-back offer prior to BellSouth rendering its first bill or disconnects their service) after he has returned to BellSouth with this offer, then he is not eligible to receive the \$75 cash-back. The customer must keep his service to receive the \$75 cash-back.

The exchange tariff language is in reference to the initial eligibility requirements, stating that in order for a potential customer to qualify for the promotion, he must have not had service with BellSouth within the last 17 days. This is an eligibility requirement to qualify for the offer.

REQUEST: Please provide an analysis demonstrating that the services offered under T-030132 and the Unlimited Answers Plan Promotion are compensatory. Please provide the basis for the average service life used in your analysis.

RESPONSE: A spreadsheet that provides the requested analysis for the BellSouth Telecommunications, Inc. services offered under T-030132 is attached as page 2 and is proprietary.

The analysis demonstrating the intrastate Long Distance portion of the \$49.99 bundled price is compensatory and is attached as page 3 and is proprietary.

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ATTACHMENT

PROPRIETARY

BellSouth Telecommunications, Inc
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ATTACHMENT

PROPRIETARY

REQUEST: Does the Unlimited Answers Plan Promotion referenced in the attached letter from BellSouth encompass Promotion #14, BellSouth Unlimited Talk Plan Promotion, that is referenced in BellSouth's long distance tariff, original page 227.2 (T-030209)? Where is the Unlimited Answers Plan Promotion referenced in your long distance tariff?

RESPONSE: The Unlimited Answers Plan Promotion referenced in the letter from BellSouth encompasses the BellSouth Long Distance Promotion #14 filed in the BellSouth Long Distance (BSLD) tariffs on Page 227.2. Please note that certain non-rate affecting changes have been made to BSLD Promotion #14, such that it is now 1st Revised Page 227.2.

The Unlimited Answers Plan Promotion is not referenced in BellSouth Long Distance's tariffs. The BellSouth Long Distance portion of the Unlimited Answers Plan Promotion includes the BSLD Promotion #14 for intrastate long distance calling, as well as a separately rated corresponding interstate long distance calling service. The long distance services in this promotion are offered only in conjunction with certain local telephone services offered by BellSouth Telecommunications.

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April 2, 2003
Item No. 6
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REQUEST: Is the \$9.24 monthly charge for the Unlimited Talk Plan Promotion that is referenced in BellSouth's long distance tariff embedded in the \$49.99 monthly fee that is referenced in the attached letter from BellSouth?

RESPONSE: Yes, the \$9.24 monthly charge for the Unlimited Talk Plan is embedded in the \$49.99 monthly fee. See response to Item No. 1 for breakout of charges.

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REQUEST: How was the mailing list developed for the attached letter from BellSouth?

RESPONSE: The mailing list was developed by taking disconnected retail customers and filtering out retail disconnect reasons (such as Moved, Deceased, No Further Use, etc.) to derive an assumption for which customers went to another LEC.