

BellSouth Telecommunications, Inc. 850 222-1201
400 Fax 850 222-8640
150 South Monroe Street
Tallahassee, Florida 32301

Nancy H. Sims
Director - Regulatory Relations

August 6, 1998

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

Re: Docket No. 960312-TP - Proposed Amendment to Rules 25-4.002, F.A.C.,
Application and Scope; 25-24.600, F.A.C., Application and Scope; 25-24.610, F.A.C.,
Terms and Definitions; Rules Incorporated; 25-24.620, F.A.C., Service Requirements for
Companies Providing Operator Services; 25-24.630, F.A.C., Rate and Billing
Requirements; and 25-24.800, F.A.C., Scope.

Dear Mrs. Bayó:

In response to the Florida Public Service Commission's Notice of Rulemaking issued on July 13, 1998, in docket No. 960312-TP, Order No. PSC-98-0939-NOR-TP, BellSouth would like to provide some brief comments on the rules. More specifically, we are putting forth our understanding of the application of the proposed rules on the provision of operator services. With these comments, BellSouth is not asking for a hearing unless the Commission Staff does not agree with our understanding of the proposed rules.

WACK _____

AFA _____ BellSouth's interpretation of the proposed operator services rules:

APP Waldwell

- CAF _____ 1) The proposed operator services rules apply to all Telecommunications Companies including Local Exchange Companies (LECs) such as BellSouth Telecommunications, Inc. (BST)
- CMU 3
- CTR _____ 2) Rule 25-24.630 "Rate and Billing Requirements" sets rate caps for various calls handled by an operator service provider in a call aggregator situation only. If operator services are offered to individual subscribers/business (not classified as call aggregators) the OSP/local exchange company charges its tariffed rates - these rates are not affected by the call aggregator OSP rate caps contained in the rule.
- EAG _____
- LEG _____
- LIN _____
- OPC _____ 3) Since BellSouth is a price regulated company, it is subject to price cap limits on its non-basic services per the Florida Statutes Chapter 364. Prior to these proposed rules, existing LECs were not included under the OSP rules and; therefore, BST included all
- RCH 1
- SEC 1

WAS _____

OTH _____

DOCUMENT NUMBER - DATE

5363 AUG -6 88

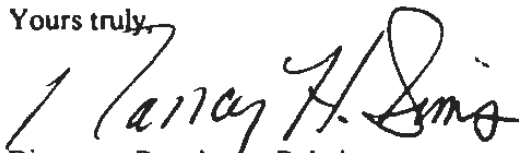
REGULATORY RELATIONS/REPORTING

of its operator services offerings in a separate non-basic service category or basket (approved by the Commission).

- 4) When the proposed OSP rules become effective, BellSouth will be allowed to compete equally with other operator services providers when providing service to call aggregators. This means that BST would apply OSP rates to call aggregators in accordance with the rate caps contained in the newly revised OSP rules. BellSouth would file a separate rate schedule for call aggregators in its tariff, and the demand and revenues associated with these services would be removed from the existing non-basic operator services "basket". (See also 364.3376(1)(b), and (2) and (3))

At the agenda conference held on June 30, 1998, BellSouth presented these same comments to the Commission and the Staff, and it appeared that our statements were accepted in the context of the adoption of the proposed rules. If you have any questions or need any further clarification on these comments, please give me a call.

Yours truly,



Director - Regulatory Relations

cc: Rick Moses
Diana Caldwell