

ORIGINAL
Legal Department

MARY K. KEYER
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98 DEC -3 PM 4:35

RECORDS AND
REPORTING

December 3, 1998

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

RE: Docket No. 981052-TP

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Susan Arrington, Jerry Hendrix and Daonne Caldwell. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

RECEIVED & FILED

Sincerely,

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Stavanza
- CTR _____
- EAG _____
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- LIN 3 torg
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

FPSC-BUREAU OF RECORDS

Mary K. Keyer
Mary K. Keyer

Enclosures

cc: All Parties of Record
A. M. Lombardo
N. B. White
W. J. Ellenberg (w/o enclosures)
Vickie Kaufman

Arrington
DOCUMENT NO.
13666-98
12-3-98

Caldwell
DOCUMENT NUMBER-DATE
13667 DEC-3 98
FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE
13668 DEC-3 98
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 981052-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 3rd day of December, 1998, to the following:

Andrea K. Welch
Telephone Company of Central
Florida, Inc.
3599 W. Lake Mary Boulevard
Suite E
Lake Mary, Florida 32746
(407) 328-5002



Mary K. Keyer

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BELLSOUTH TELECOMMUNICATIONS, INC.
TESTIMONY OF SUSAN ARRINGTON
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 981052-TP
DECEMBER 3, 1998

Q. PLEASE STATE YOUR NAME AND COMPANY NAME AND ADDRESS.

A. My name is Susan Arrington. I am employed by BellSouth
Telecommunications, Inc. as a Manager in Interconnection Services - Pricing.
My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from the University of Georgia, Athens, Georgia, in 1986, with a
Bachelor of Arts Degree. I began employment with Southern Bell in 1986, in
the Southern Bell Legal Department. In August 1996, I joined the
Interconnection Services – Pricing organization handling Alternative Local
Exchange Carrier (“ALEC”) negotiations and resale issues.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

1 A. The purpose of my testimony is address the arbitration issues in this docket. I
2 will explain to this Commission why BellSouth should be allowed to recover
3 from the Telephone Company of Central Florida (TCCF), the non-recurring
4 and recurring costs incurred by BellSouth to provide Operational Support
5 Systems (OSS) to ALECs. I will also explain why BellSouth should not be
6 required to make its ESSX® Service, which is a grandfathered service,
7 available for resale to new customers in TCCF's new resale agreement.

8

9 Q. WHAT ARE OPERATIONAL SUPPORT SYSTEMS AND FOR WHAT
10 ARE THEY USED?

11

12 A. Operational Support Systems are those systems and databases used to
13 provision telecommunications services required by ALECs for pre-ordering,
14 ordering, provisioning, maintenance and repair, and billing.

15

16 Q. IS BELL SOUTH REQUIRED BY LAW TO PROVIDE OSS FOR USE BY
17 ALECS?

18

19 A. Yes. Under Section 251 (C)(3) of the Telecommunications Act of 1996 (the
20 "Act"), BellSouth and other Incumbent Local Exchange Carriers (ILECs) are
21 required to develop non-discriminatory electronic interfaces for access to
22 BellSouth's OSS in order to remove barriers to competition.

23

24 Q. HAS BELL SOUTH PROVIDED OSS FOR USE BY ALECS?

25

1 A. Yes. BellSouth has developed and implemented the required non-
2 discriminatory electronic interfaces pursuant to the Act, and should be allowed
3 to recover its cost for developing, implementing and maintaining such systems
4 as well as to recover on-going order processing costs.

5

6 Q. HAVE OTHER COMMISSIONS IN BELLSOUTH'S TERRITORY
7 ADDRESSED THE RECOVERY OF BELLSOUTH'S DEVELOPMENTAL
8 AND PROCESSING COSTS?

9

10 A. Yes. Several of the Commissions in the other BellSouth states have agreed
11 that BellSouth is entitled to recover its cost of development of the electronic
12 interfaces and processing costs. The Commissions in Georgia Docket No.
13 7061-U, Kentucky Case No. 96-431, Mississippi Docket No. 97-AD-544 and
14 Louisiana Docket No. U-22022/22093 have ordered final OSS rates. The OSS
15 rates BellSouth proposed to TCCF during negotiations, shown in Exhibit
16 SMA-1, are comparable to the ordered rates in these other states.

17

18 Q. SHOULD BELLSOUTH BE PERMITTED TO RECOVER FROM TCCF ITS
19 NONRECURRING AND RECURRING COSTS OF PROVIDING OSS FOR
20 USE BY ALECS?

21

22 A. Yes. As this Commission recognized in its April 29, 1998, Order in Dockets
23 Nos. 960757-TP, 960833-TP and 960846-TP, "OSS costs, manual and
24 electronic, may be recoverable costs incurred by BellSouth." The Commission

25

1 encouraged the parties in the above-referenced dockets to negotiate rates for
2 the OSS functions.

3

4 Q. HAS BELLSOUTH ATTEMPTED TO NEGOTIATE RATES FOR OSS
5 FUNCTIONS WITH TCCF?

6

7 A. Yes. BellSouth proposed interim OSS rates to TCCF during negotiations. The
8 parties discussed the inclusion of these rates in the new resale agreement and
9 considered alternative language proposed by both parties. TCCF ultimately
10 rejected the inclusion of OSS rates in its agreement, and has submitted this as
11 an issue in this arbitration proceeding.

12

13 Q. IF BELLSOUTH IS PERMITTED TO RECOVER ITS COSTS OF
14 PROVIDING OSS FOR USE BY ALECS, HOW SHOULD THE CHARGES
15 FOR SUCH USE BE DETERMINED?

16

17 A. Charges for OSS should be based on BellSouth's cost studies which are
18 attached to Ms. Caldwell's Direct Testimony as Exhibit DDC-1.

19

20 Q. WHAT LANGUAGE AND RATES REGARDING OSS SHOULD BE
21 INCLUDED?

22

23 A. OSS language in the resale agreement between BellSouth and TCCF should be
24 negotiated between the parties following the Commission's ruling in this case.
25 The parties should negotiate language consistent with or reflective of this

1 Commission's order on this issue. BellSouth does not agree that the contract
2 language for OSS should be an issue to be decided by the Commission, but is
3 one that should be negotiated by the parties. Alternatively, BellSouth
4 proposes the following language should be included in the new resale
5 agreement between the parties:

6 All costs incurred by BellSouth to develop and implement operational
7 interfaces shall be recovered from Resellers who utilize these services.
8 The applicable rates for the Operational Support Systems (OSS) are set
9 forth in Exhibit A of this Agreement. Such rates include charges for
10 development and implementation, as well as for mechanized and
11 manual processing. Such rates will apply as of the effective date of this
12 Agreement.

13

14 Q. WHAT OSS RATES SHOULD BELL SOUTH BE PERMITTED TO
15 CHARGE?

16

17 A. BellSouth had originally proposed interim rates to TCCF pending BellSouth's
18 final OSS cost studies. Now that such studies have been finalized, the new
19 rates BellSouth would propose to TCCF are a mechanized order charge of
20 \$6.78 per Local Service Request (LSR), and a manual service order charge of
21 \$20.08 per LSR. Ms. Caldwell discusses these OSS cost studies attached as
22 Exhibit DDC-1 to her Direct Testimony.

23

24

25

1 Q. YOU STATED YOU WILL ALSO ADDRESS THE ESSX ISSUE IN THIS
2 CASE. SHOULD BELLSOUTH'S ESSX® SERVICE BE MADE
3 AVAILABLE FOR RESALE IN TCCF'S NEW RESALE AGREEMENT?

4
5 A. No. BellSouth's ESSX® Service is a grandfathered service and should not be
6 made available for resale to new customers in TCCF's new resale agreement
7 with BellSouth.

8
9 Q. WHAT IS A GRANDFATHERED SERVICE?

10
11 A. A grandfathered service is a service that is no longer available for sale to, or
12 transfer between, end-users. New services are made available to replace the
13 existing service that has been grandfathered.

14
15 BellSouth's ESSX® Service was grandfathered as a Type 4 service, which
16 basically means that it is not available for new customers. In accordance with
17 the tariff grandfathering this service, current month-to-month subscribers of
18 BellSouth's ESSX® Service are able to maintain their existing ESSX
19 arrangements at their current rates until the expiration date in the tariff.
20 Subscribers, such as TCCF, under a tariffed pricing arrangement for
21 BellSouth's ESSX® Service, are able to maintain their existing ESSX
22 arrangements at the current rates for the remainder of their pricing arrangement
23 or until the expiration date in the tariff, if their pricing arrangements expire
24 before then. At that time, subscribers of this grandfathered service will have

25

1 to disconnect their ESSX® Service and either convert to a MultiServ® or
2 MultiServ Plus® Service, or subscribe to an alternative service.

3

4 Q. WHEN DID BELLSOUTH'S ESSX® SERVICE BECOME
5 GRANDFATHERED?

6

7 A. BellSouth filed a tariff, which became effective on May 30, 1996, that
8 grandfathered BellSouth's ESSX® Service. A copy of Section 112.3 of this
9 tariff is attached as Exhibit SMA-2.

10

11 Q. HAS THIS COMMISSION ADDRESSED GRANDFATHERED SERVICES
12 AND THEIR AVAILABILITY FOR RESALE TO NEW CUSTOMERS?

13

14 A. Yes. This Commission, in its Order dated December 31, 1996, (Order No.
15 PSC-96-1579-FOF-TP), in Docket Nos. 960833-TP, 960846-TP and 960916-
16 TP, found that grandfathered services are available for resale only to existing
17 customers.

18

19 Q. HOW DOES THE GRANDFATHERING OF ESSX® SERVICE AFFECT
20 TCCF IN THIS DOCKET?

21

22 A. The original Resale Agreement between BellSouth and TCCF was signed on
23 May 28, 1996. The term of the agreement was for a two-year period. Section
24 III. A. of the agreement specifically provided that "Notwithstanding the
25 foregoing, the following are not available for purchase: Grandfathered

1 services....” On May 29, 1996, TCCF requested a seventy-three month tariffed
2 pricing arrangement for BellSouth’s ESSX® Service, just prior to the service
3 being grandfathered on May 30, 1996. BellSouth incorrectly permitted TCCF
4 to resell its ESSX® Service after the service had been grandfathered for the
5 two-year period of TCCF’s Resale Agreement. TCCF should not have been
6 allowed to resell this grandfathered service to new customers after May 30,
7 1996, when the service was grandfathered. Pursuant to the tariff that
8 grandfathered ESSX® Service and TCCF’s seventy-three month pricing
9 arrangement, TCCF’s existing ESSX customers are able to maintain existing
10 ESSX arrangements until May 2002. However, TCCF may not resell this
11 grandfathered service to new customers.

12
13 If TCCF is allowed to continue offering this grandfathered service to new
14 customers in its new resale agreement, TCCF will be violating the
15 Commission-approved tariff that grandfathered ESSX® Service, and will in
16 essence make BellSouth’s ESSX® Service available for resale to all ALECs,
17 thus revoking the grandfathered status of this service.

18
19 Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

20
21 Yes. BellSouth has a right to recover the costs it incurs in developing and
22 implementing the electronic interfaces required by the Act. Furthermore, this
23 Commission has already stated that manual and electronic OSS costs may be
24 appropriate costs to be recovered by BellSouth. Therefore, BellSouth’s
25 proposed OSS rates are appropriate.

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With respect to the ESSX issue, ESSX® Service should not be made available for resale to new customers by TCCF under its new resale agreement with BellSouth. This Commission approved the tariff that grandfathered BellSouth's ESSX® Service as a Type 4 Service on May 30, 1996, making it unavailable to new customers. This Commission has also held in an arbitration proceeding that grandfathered services are only available for resale to existing customers, not to new customers. Finally, TCCFs original resale agreement precludes TCCF from reselling grandfathered services. Therefore, BellSouth's ESSX® Service, a grandfathered service, is not available to TCCF for resale to new customers, and should not be included in the new resale agreement between BellSouth and TCCF.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

OPERATIONAL SUPPORT SYSTEMS (OSS) RATES				
	Interactive Ordering and Trouble Maintenance System		OSS Order Charge	
	Non-Recurring Establishment Charge	Monthly Recurring Charge	Electronic Per LSR received from the CLEC by one of the OSS interactive interfaces	Manual Per LSR received from the CLEC by means other than one of the OSS interactive interfaces
ALABAMA	\$100.00	\$50.00	\$10.80	\$22.00
FLORIDA	\$100.00	\$50.00	\$10.80	\$22.00
GEORGIA	\$200.00	Per 1,000 electronic LSRs received from the CLEC ¹ First 1,000 - \$550.00 Add'l 1,000 - \$110.00	Note ²	\$22.00
KENTUCKY			\$10.89	\$22.00
LOUISIANA	\$100.00	\$50.00	\$9.16	\$22.00
MISSISSIPPI			\$10.80	\$22.00
NORTH CAROLINA	\$100.00	\$50.00	\$10.80	\$22.00
SOUTH CAROLINA	\$100.00	\$50.00	\$10.80	\$22.00
TENNESSEE	\$100.00	\$50.00	\$10.80	\$22.00

Rates for Operational Support Systems stated above are interim and are subject to modification based upon receipt of a final, non-appealable order by each state's Public Service Commission.

In addition to OSS charges, applicable service order and related charges apply per the tariff.

¹ The Charge per 1,000 LSRs applies on a per CLEC basis.

² The Georgia Public Service Commission ("PSC") ordered in Docket 7061 that there would be no OSS charge within the Charge for Electronic Order column. Instead the Georgia PSC ordered monthly recurring charges based on the number of LSRs received from the CLEC.

BELLSOUTH
TELECOMMUNICATIONS, INC.

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 22

FLORIDA

ISSUED: July 1, 1996

EFFECTIVE: July 15, 1996

BY: Joseph P. Lacher, President - FL
Miami, Florida

A112. OBSOLETE CENTRAL OFFICE NON-TRANSPORT SERVICE OFFERINGS¹ (N)**A112.2 Centrex-CO Service (Cont'd)****A112.2.6 Rates and Charges (Cont'd)**

D. Auxiliary Services for Systems served from No. 1 ESS Type Central Office Equipment (Group "A" and "B" Services) (Cont'd)

3. Centrex-CO Arrangement for Centralized Attendant Service from No. 1 Electronic Switching Service. (Cont'd)

b. Rates and Charges (Cont'd)

(2) Release Link Trunk Terminal Equipment - BRANCH Locations²³ (Cont'd)

	Feature Establishment Charge	Monthly Rate	USOC
(d) Release Link Trunk, additional terminations after the first two, each	\$20.00	\$19.00	EC5
(3) CAS Attendant Console Equipment			
(a) Each ⁴	-	-	NA
(4) Uniform Numbering			
(a) Per CENTREX-CO Location	16.00	-	NA
(b) Each 100 numbers or fraction thereof	11.00	-	NA

A112.3 ESSX-1 Service

(Obsoleted 05/30/96, Type 4) Service rates and charges in this section are not available for new installations, moves, transfers of service or replacements of existing service.

Obsolescence Rules

1. ESSX-1 service subscribers under a month-to-month payment option will be allowed to maintain their existing service at month-to-month rates until 12/31/98.

On or prior to 12/31/98 ESSX-1 service month-to-month subscribers must; 1) convert their entire ESSX-1 service account to MultiServ^{*} service or MultiServ PLUS^{*} service as described in A12.20 and A12.21 respectively of this Tariff; or 2) subscribe to an alternate service.

Note 1: Text is shown as new due to reissue of all Tariff Sections. No Changes in rates or regulations were made with this filing.

Note 2: Each rate element shown provides only the basic release link trunk termination equipment facilities located at the central office where the basic Centrex-CO service is provided and is in addition to other rates and charges applicable for the associated Centrex-CO service and Private Line Services and Channels.

Note 3: Each Release Link Trunk termination requires 2 channels between the MAIN and BRANCH locations. Release Link Trunk Termination Equipment charges are in lieu of Tie-Line and Miscellaneous Line Termination charges.

Note 4: Apply rates and charges as specified in Section A112.1.8.A.2. of this Tariff for Data Link

* Service Mark of BellSouth Corporation

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 23

ISSUED: July 1, 1996
BY: Joseph P. Lacher, President - FL
Miami, Florida

EFFECTIVE: July 15, 1996

A112. OBSOLETE CENTRAL OFFICE NON-TRANSPORT SERVICE OFFERINGS¹

(N)

A112.3 ESSX-1 Service (Cont'd)

2. ESSX-1 service subscribers under contract will be allowed to maintain their ESSX-1 service until the expiration date of their contract or until 12/31/98 if their contract expires prior to that date. Upon expiration of their contract or by 12/31/98, ESS-1 service subscribers must disconnect their ESSX-1 and either; 1) convert their entire ESS-1 service account to MultiServ[®] service or MultiServ PLUS[®] service as described in A12.20 and A12.21 respectively of this Tariff; or 2) subscribe to an alternate service.

A112.3.1 Auxiliary Services**A. Attendant Service****1. 50A Consoles**

(Obsoleted October 5, 1981, Type 3)

a. General

- (1) The 50A Console will be furnished under Plan 1 or Plan 2 in accordance with regulations as stated in Section A22. of this Tariff.
- (2) The 50A Consoles are provided only where the central office serving the ESSX-1 System has been arranged for use with such consoles.
- (3) One-way call splitting is provided and allows the attendant to exclude only the incoming calling party while announcing the incoming call to the called party.
- (4) The 50A Consoles are available only equipped with a Touch-Tone[®] dial and therefore, rates and charges for Touch-Tone[®] Calling Service as specified in Section A13. of this Tariff will apply.
- (5) The Direct Station Selection (DSS) capability is only available with the 131 and 151 type console and is included in the console rate. The ESSX-1 station lines equipped for DSS must be in consecutive one hundred station number group(s). Station lines equipped for DSS may, as an option, be equipped for station line visual busy indication on a "per key" basis. Where more than one console is equipped for the DSS and station busy lamp indication feature, the DSS and station busy indication on the second console are a multiple appearance of the first console. Only two consoles may be equipped with the DSS-Busy Lamp Field (BLF). The ESS-BLF feature can be provided only to the main stations at the same location as the consoles.
- (6) The ESSX-1 Primary Feature Package at rates as specified in Section A112.1.8.C.1. of this Tariff is required with each ESSX-1 circuit designated as a Console Access Loop.
- (7) Each ESSX-1 circuit (Console Access Loop), terminating on a console loop key requires a Loop Terminating Equipment.
- (8) Console Access Loops are required between the No. 1 ESS serving the ESSX-1 System and the console location. These facilities are used to complete incoming calls for the listed directory number and may be arranged for completing dial "0" traffic. In addition, Console Access Loops have the same capabilities as ESSX-1 station lines. Console Access Loops terminate directly on apparatus of a specific console. Multiple appearances of a Console Access Loop are not provided.
- (9) Night Service is provided by use of the Night Trunk Answer Any Station or the Directed Call Pickup optional feature of the ESSX-1 System on the listed directory number.

Note 1: Text is shown as new due to reissue of all Tariff Sections. No Changes in rates or regulations were made with this filing.

BELLSOUTH
TELECOMMUNICATIONS, INC.

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 24

FLORIDA

ISSUED: July 1, 1996

EFFECTIVE: July 15, 1996

BY: Joseph P. Lacher, President - FL
Miami, Florida

A112. OBSOLETE CENTRAL OFFICE NON-TRANSPORT SERVICE OFFERINGS¹

(N)

A112.3 ESSX-1 Service (Cont'd)**A112.3.1 Auxiliary Services (Cont'd)****A. Attendant Service (Cont'd)****1. 50A Consoles (Cont'd)****a. General (Cont'd)**

- (10) Control channels are required for various console optional features as indicated and are provided at the appropriate rates and charges as specified.
- (11) Time and Material Charges apply to all customer requested installations, moves, changes, removals, rearrangements, and maintenance of premises wiring performed by the Company on the customer's premises, except as excluded or otherwise provided for in Section A4 of this Tariff.

b. Rates**(1) Common Equipment for 50A Consoles**

	Monthly Rate	USOC
(a) Attendant access circuit (one required per loop termination equipment), each	\$5.40	EAS
(2) Console Access Loop ²		
(a) Each (maximum of 14 per console ³)	16.65	EAR
(3) Common Equipment for Optional Features		
(a) Circuit group busy (one required per circuit group busy indication), each	3.05	EAX
(b) Position busy ³ (position busy may not be provided for a one position arrangement), per console	5.10	CXJ
(c) Multiple Position Hunt for ESSX-1 systems provided with more than one 50A Console, per system ⁴	34.20	CXH
(d) Fixed night service ⁵	5.40	CXX
(4) Customer Premises Equipment... Consoles etc.		

See Section A114. of this Tariff for rates and charges for 50A Consoles and associated customer premises equipment.

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Note 2: See Section A112. for charges applicable for associated ESSX-1 Primary Feature Package and optional features.

Note 3: For charges applicable for associated Supervisory Control Channels, see A13.1, Type 1105 Channel.

Note 4: Charges for the appropriate line hunting arrangements associated with multiple position hunt are specified in Section A112.1.8.C.2.b.(16).

Note 5: See Section A112.1.8.C.1. for charges applicable for associated ESSX-1 Primary Feature Package and optional features.

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 25

ISSUED: July 1, 1996
BY: Joseph P. Lacher, President - FL
Miami, Florida

EFFECTIVE: July 15, 1996

A112. OBSOLETE CENTRAL OFFICE NON-TRANSPORT SERVICE OFFERINGS¹ (N)**A112.3 ESSX-1 Service (Cont'd)****A112.3.1 Auxiliary Services (Cont'd)**

- B. Auxiliary Attendant Features**
(Obsoleted 9-24-79, Type 3, Tariff Reference Section A12.1.8.B.1)
1. Attendant Control of Facilities
(See A12.1.8 for Rates and Charges)

A112.3.2 Reserved for Future Use**A112.4 Reserved for Future Use****A112.5 Electronic Tandem Switching Features**

(Obsoleted 05/30/96, Type 4) Service rates and charges in this section are available for inward activity of existing subscribers only as specified in the obsolescence rules stated in A112.26. Not available for new service or entire moves of service to new locations.

A112.5.1 Regulations

- A. Explanation of Terms**
(Obsoleted 6-28-89, Type 2. Not offered for new installations on or after the specified obsoleted date.)
1. Station Message Detail Recording to Premises (SMDR-P)
SMDR-P provides a record, on magnetic tape equipment located at the customer's premises, of calls originating from ESSX[®] service/ Centrex-CO main station lines to locations outside the same ESSX[®] service/ Centrex-CO System. Facility groups may also be designated as requiring originating and/or terminating records.
Account Codes - Account codes are an SMDR-P option which permit a main station line user to dial a series of digits (code) which will appear in the SMDR-P record for that particular call. The Account Code can be used by the customer for account or project identification. Adding an Account Code to a call, where arrangements have been made to provide this capability, is at the discretion of the main station line user. Each customer's Account Code must contain the same number of digits, not to exceed eight, and must not conflict with on-network code assignments.
- B. Station Message Detail Recording To Premises (SMDR-P)**
1. SMDR-P is not represented to be a provision of billing detail.
 2. Station message detail records will be provided on terminal equipment located at the customer's premises at the rates and charges specified in A112.5.2 following.
 3. The customer must provide compatible equipment located at his premises to record the SMDR-P Data.
 4. Processing of message detail information (SMDR-Basic) by the Company's accounting center is not provided with this arrangement.

Note 1: Text is shown as new due to reissue of all Tariff Sections. No Changes in rates or regulations were made with this filing.