State of Florida



Jublic Service Commission -M-E-M-O-R-A-N-D-U-M-

ORIGINAL

DATE: February 12, 2002

TO: Division of Commission Clerk and Administrative Services (Bayó)

- FROM: Division of Competitive Markets and Enforcement (İleri) i and
- **RE:** Docket No. 011392-TP: Complaint of AT&T Communications of the Southern States Inc., TCG South Florida, and AT&T Broadband Phone against BellSouth Telecommunications, Inc. for improper use and treatment of certain NXX codes.

Please place the following correspondence from BellSouth in the above referenced docket.

February 1, 2002 Resolution Offering Letter from Mr. Stan Greer (BellSouth) to Mr. Levent İleri (FPSC) Regarding AT&T Complaint

If you have any questions, please call me at 413-6562.

LI Attachment

cc: Division of Legal Services (F. Banks) Division of Competitive Markets and Enforcement (Casey, Bulecza-Banks)

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DOCUMENT NUMBER-DATE 01690 FEB 138 FPSC-COMMISSION CLERK



BellSouth Telecommunications, Inc. Suite 400 150 South Monroe Street Tallahassee, Florida 32301 850 224-5139 Fax 850 222-8640 Stan L. Greer Manager – Regulatory Relations COMPETITIVE SERVICE

February 1, 2002

Mr. Levent Ileri Engineer Division of Competitive Markets & Enforcement Florida Public Service Commission 2540 Shumard Oak Boulevard

RE: Docket No. 011392-TP – ATT Complaint Oddball code

Dear Mr. Ileri:

As you are aware, BellSouth currently routes traffic intended for Uniserve customers in the 930 NXX code via its Traffic Operator Position System ("TOPS") platform in order to complete and capture the necessary information to bill the Uniserve customer. Although for its own use BellSouth establishes separate trunk groups for ordinary TOPS traffic and 930 Uniserve traffic per Numbering Plan Area ("NPA"), BellSouth allows Alternative Local Exchange Carriers ("ALECs") to establish a single trunk group to the TOPS platform and thus route both types of traffic over a single trunk group per NPA.

The allegations raised by AT&T in its Complaint are specifically limited to ALECs that have not established trunk groups to BellSouth's TOPS platform in a given NPA. BellSouth believes that ALECs should establish trunk groups to BellSouth's TOPS platform in order to route calls from the ALECs' end users to Uniserve customers in an NPA, since that would allow the ALECs to be at parity with the way BellSouth routes the traffic. Nonetheless, BellSouth has been working on a routing process that will allow ALECs that do not establish trunk groups to the TOPS platform to route calls to Uniserve customers over the ALECs' interconnection trunks and thence to the Uniserve customer, pursuant to PSC-01-0824-FOF-TP issued in Docket No. 000649-TP. Accordingly, with this new process, ALEC customers will be able to complete calls to Uniserve customers regardless of whether the ALEC has established a trunk group to the TOPS platform. BellSouth wants to make it clear, however, that this routing option is not intended for and BellSouth will not allow the interconnection trunks to be used for the transport of ordinary TOPS traffic to the TOPS tandem.

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Mr. Levent Ileri February 1, 2002 Page 2 of 2

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This letter is to provide notice that BellSouth has been able to develop a routing process that we have tested with MCI WorldCom and BellSouth believes that this routing process will resolve one of AT&T's issues in this case, namely AT&T's claims that its customers in the 954 NPA cannot complete calls to the 930 NXX code. Basically, AT&T will be able to route calls to Uniserve customers in the 930 NXX code over AT&T's interconnection trunks and BellSouth will transport this traffic to the TOPS tandem for routing to the Uniserve customer.

Use of this new method of routing traffic to Uniserve customers raises a technical issue. With this routing process, the Automatic Number Identification ("ANI") information is not passed with the traffic to the Uniserve customer. BellSouth has reviewed its records and has determined that no Uniserve customer has purchased the ANI option and thus BellSouth does not believe that the lack of ANI information will prohibit the implementation of the process or routing of the ALEC traffic to the appropriate Uniserve customer.

Although not required, BellSouth is willing to offer this new routing process to AT&T in return for the withdrawal of the above-referenced complaint.

If you have any questions, please do not hesitate to call me at 224-5139.

Sincerely, Stan L. Gree

Manager Regulatory Relations

Cc: Tracy Hatch - Counsel for AT&T