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LAURENCE J. LEBOWITZ
OF COUNSEL

ORIGINAL

May 9, 2002

Via Federal Express

Blanca S. Bayo
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oaks Blvd.
Tallahassee, FL 32399-0850

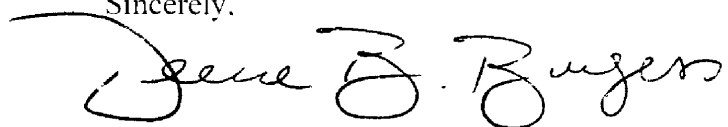
Re: Docket No. 020272-TL - 511, Inc.

Dear Ms. Bayo:

Enclosed please find one original and fifteen (15) copies of our Amended Complaint and Answer to Counterclaims and fifteen (15) copies of the Ellen Gache Affidavit. We request that you file them with the aforementioned docket. An original copy of the Affidavit by Ms. Ellen Gache will arrive under separate cover today as discussed with Ms. Linda Dodson.

A copy of this letter is enclosed. We would appreciate if you would mark it to indicate that you have received this package and return it to us. If there are any questions, please do not hesitate to contact me.

Sincerely,



Deena B. Burgess

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC 1
OTH _____

CCA note: Ellen Gache
original affidavit was
received under separate
DBB/efs cover on same date
(5-10-02) and will be
processed as "official
filing" rather than
copy provided with
Ms. Burgess's 5-9 letter. (see DN 05069-02)

kh

DN 05071-02

DN 05072-02

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of 511, Inc¹. Against)
BellSouth Telecommunications, Inc.) Docket No. 020272-TL
and Request for Emergency Relief)
_____)

**AMENDED COMPLAINT OF INTERNATIONAL MANAGEMENT GROUP, L.L.C.
AGAINST BELL SOUTH TELECOMMUNICATIONS, INC.
AND REQUEST FOR EMERGENCY RELIEF REQUIRING
BELL SOUTH TELECOMMUNICATIONS, INC. TO
PROVIDE AN ALTERNATIVE N11 CODE**

Pursuant to Florida Statutes (“F.S.”) §§ 364.162(1) and 364.058, and Rule 25-22.063(2) of the Florida Administrative Code, International Management Group, L.L.C. (“IMG”) files this Amended Complaint and Request for Emergency Relief (“Amended Complaint”) against BellSouth Telecommunications, Inc. (“BellSouth”). Emergency Relief is required to compel BellSouth to perform its obligations under its General Subscriber Service Tariff (“GSST”) and to enjoin BellSouth’s transfer of IMG’s Abbreviated Dialing Code 511 until BellSouth complies with the provisions of the tariff relating to substituted exchanges or dialing arrangements.

On or about July 3, 2000, the present owners of IMG acquired all of the stock and assets of 511, Inc. 511, Inc.² had previously obtained the rights and license to promote the

¹ Although the actual party in interest is being amended to International Management Group, L.L.C. in the place of 511, Inc., Ms. Linda Dodson, Staff Counsel for the Commission, has suggested that the caption be left as it was originally filed in order to avoid confusion.

² BellSouth originally registered the 511 exchange to Dial 511, Inc. in error. By correspondence dated May 17, 2000, Ellen Gache requested that the BellSouth error be corrected. Thereafter, all future correspondence was properly addressed to 511, Inc.

Abbreviated Dialing Code 511 in certain Basic Local Calling Areas (“BLCAs”) through its original principal, Ellen Gache, who had purchased the rights via a lottery conducted by BellSouth. On or about January 31, 2001, IMG, under its wholly owned subsidiary, 511, Inc., purchased from BellSouth, through its clearinghouse PriceWaterhouseCoopers L.L.P., the rights to promote and service the Abbreviated Dialing Code 511 in certain additional areas within the BLCAs for approximately Forty Three Thousand Nine Hundred Dollars (\$43,900.00). On or about September 21, 2001, IMG allowed their wholly owned subsidiary, 511, Inc., to be administratively dissolved. On or about November 15, 2001, through its subsidiary 511, Inc., IMG received correspondence from PriceWaterhouseCoopers LLP, regarding the re-assignment of the 511 Abbreviated Dialing Code in the BLCAs from 511, Inc. to the Florida Department of Transportation (“DOT”).

BellSouth has informed Mr. Greg Wynn, Vice President of IMG, that it “has no current plans to provide an alternative offering to those N11 customers who can no longer subscribe to Abbreviated Dialing Services due to the FCC’s rulemaking.” (See February 1, 2002, e-mail correspondence from Mr. Danny Flynn, Sr., BellSouth Senior Account Executive, attached hereto as Exhibit 1). As to the option of assigning a seven-digit dialing arrangement, BellSouth has, without meaningful explanation, decided that such an alternative arrangement is not feasible.

I. JURISDICTION

1. The Florida Public Service Commission (“Commission”) has jurisdiction over this Complaint pursuant to its broad authority to regulate telecommunications companies under F.S. § 364.01 et seq. Specifically, the Commission has jurisdiction in order to: (iii) “ensure that all providers of telecommunications services are treated fairly, by preventing anti-

competitive behavior and eliminating unnecessary regulatory restraint.” F.S. § 364.01 et seq. Additionally, the Commission has the power to regulate the terms of telecommunications service contracts, such as BellSouth’s GSST.

2. Sections 251 and 252 of the federal Telecommunications Act of 1996 (the “Act”), 42 U.S.C. §§ 251 and 252, provide further jurisdiction for the Commission to resolve this Complaint.

II FACTUAL ALLEGATIONS

3. IMG is a Florida State domestic Limited Liability Company with its principal place of business located at 1625 East Northern Avenue, Suite 105, Phoenix, Arizona 85020. IMG is a provider of paid telecommunications services in the State of Florida.

4. BellSouth is a Georgia State corporation with its principal place of business located at 675 West Peachtree Street, Atlanta, Georgia 30375. BellSouth is a provider of local exchange services in the State of Florida.

5. On or about July 3, 2000, the present owners of IMG acquired all of the stock and assets of 511, Inc. 511, Inc. had obtained the rights and license to promote the Abbreviated Dialing Code 511 in certain BLCAs through its then principal, Ellen Gache, the individual who originally purchased the rights via a lottery conducted by BellSouth.

6. BellSouth was notified of each of these corporate acquisitions (See correspondence dated May 17, 2000, which is attached to the accompanying affidavit of Ellen Gache, attached hereto as Exhibit 2.)

7. While BellSouth maintains that the GSST is obsolete, by its terms, the GSST continues to apply to existing customers. (See GSST § A139.1)

8. Pursuant to Section A39.1.2 (D) of the GSST, in the event that an Abbreviated Dialing Code (hereinafter referred to as "N11 Code") is recalled, BellSouth must transfer affected N11 subscribers to an alternative abbreviated dialing arrangement, if technically and economically feasible. (See applicable provisions of GSST attached hereto as Exhibit 3).

9. Absent proof that such transfer is not technically and economically feasible, an alternative N11 Code must be assigned. (See GSST § A139.1.2 (D))

10. Where transfer to an alternative abbreviated dialing arrangement is not technically and economically feasible, a seven-digit dialing arrangement must be provided to the affected N11 subscriber. (See GSST § A139.1.2 (D))

11. On or about November 15, 2001, IMG, through its subsidiary 511, Inc., received correspondence from PriceWaterhouseCoopers LLP detailing the assignment of the 511 Abbreviated Dialing Code in the Miami Basic Local Calling Areas ("BLCAs") to the DOT.

12. IMG has contacted BellSouth repeatedly over the past few months, demanding the assignment of an alternative N11 Code and, if not feasible, a seven-digit dialing arrangement. (See most recent demand letter dated February 27, 2002, from IMG's counsel, Klein, Zelman, Rothermel & Dichter, L.L.P., attached hereto as Exhibit 4).

13. Contrary to the express provisions of the GSST, BellSouth has maintained that it "has no current plans to provide an alternative offering to those N11 customers who can no longer subscribe to N11 due to the FCC's rulemaking." (See e-mail correspondence from Mr. Danny Flynn, Sr., BellSouth Senior Account Executive, dated February 1, 2002, attached hereto as Exhibit 1).

14. As to the option of assigning a seven-digit dialing arrangement, BellSouth has declared, that such an alternative arrangement would not succeed. BellSouth claims to lack the technical ability to identify the Automatic Number Identification (“ANI”) of the calling party that would allow BellSouth to properly bill customers on behalf of IMG were it assigned a seven-digit dialing arrangement. However, Section A39.1.2 (D) of the GSST is not conditional; BellSouth MUST provide IMG with a seven-digit dialing arrangement if an N11 code cannot be supplied. There is no other alternative under the GSST guidelines. To leave IMG without a replacement for its 511 exchange, would clearly violate the Commission approved BellSouth Tariff, rendering BellSouth responsible to IMG for damages and to the Commission for appropriate penalties.

III CLAIM FOR EMERGENCY RELIEF

15. IMG and 511, Inc. have spent approximately Nine Hundred Thousand Dollars (\$900,000.00) in connection with advertising and promoting its 511 service to customers in the BLCAs in which IMG has the rights to the 511 Exchange. The continued refusal of BellSouth to provide an alternative N11 Code or seven-digit dialing arrangement will prevent IMG from providing service to existing and potential customers, resulting in excessive customer chargebacks. Should IMG not be provided with an alternative N11 code or seven-digit dialing arrangement that would allow it to migrate its customers when the 511 Abbreviated Dialing Code is scheduled to be transferred to the DOT on or about May 15, 2002, IMG stands to lose an additional Four Hundred and Thirty Thousand Dollars (\$430,000.00) in stranded capitalization and outstanding loan obligations. As a direct result of the foregoing, IMG will suffer substantial monetary damages as well as irreparable damage to its goodwill for which there is no adequate remedy at law.

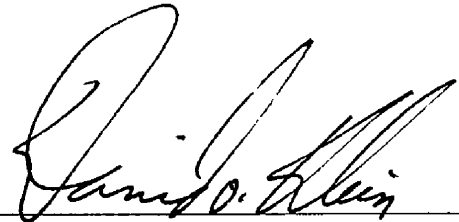
16. Immediate Commission action is needed to prevent damage to IMG and its customers and to ensure that IMG can offer services to its existing and future customers, without an interruption in service. Moreover, Commission action is required to force BellSouth to either provide IMG with an alternative N11 Code or a seven-digit dialing arrangement prior to the transfer of the 511 exchange to the DOT.

IV CONCLUSION

WHEREFORE, IMG respectfully requests that the Commission:

- (i) Order BellSouth to provide acceptable documented proof that transfer to an alternative abbreviated dialing arrangement is not technically and economically feasible;
- (ii) Absent production of same, order BellSouth to immediately assign an alternative N11 Code to IMG; and
- (iii) Should BellSouth produce acceptable documentation demonstrating that the assignment of an alternative abbreviated dialing code is not technically and economically feasible, order BellSouth, in accordance with the provisions of the GSST, to provide IMG with a seven-digit dialing arrangement. IMG respectfully requests that the Commission act expeditiously in this matter to prevent a lapse in service as monetary damages, as well as damage to IMG's goodwill, will begin to mount on or about May 15, 2002, when the 511 Code is scheduled to be transferred from IMG to the DOT; and
- (iv) Enjoin the transfer of the 511 exchange until after the Commission has made its ruling in this proceeding.

Dated: New York, New York
May 8, 2002



David O. Klein
Klein, Zelman, Rothermel & Dichter, L.L.P.
485 Madison Avenue
New York, New York 10022
(212) 935-6020
Attorneys for Complainant

STATE OF NEW YORK)
 : ss.
COUNTY OF NEW YORK)

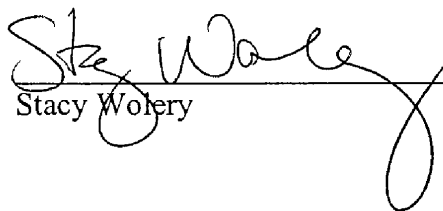
Stacy Wolery, being duly sworn says: I am not a party to the action, am over 18 years of age and reside in Rego Park, New York.

On May 9, 2002, I caused to be served a true copy of IMG, LLC's Amended Complaint in the following manner:

- by mailing the same in a sealed envelope, with postage prepaid thereon, in a post office official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:
- by delivering the same personally to the persons and at the addresses indicated below:
- by facsimile to the last known facsimile numbers of the persons at the addresses and facsimile numbers indicated below:
- Other: FEDERAL EXPRESS

Nancy B. White, Esq.
James Meza III, Esq.
c/o Nancy H. Sims, Esq.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301
Attorneys for BellSouth Telecommunications, Inc.

R. Douglas Lackey
675 W. Peachtree St., N.E., Suite 4300
Atlanta, GA 30375



Stacy Wolery

Sworn to before me this
9th day of March, 2002



Notary Public
DANA CHARLTON
Notary Public, State of New York
No. 60-4512786
Qualified in Westchester County
Commission Expires November 30, 2005

Russell Stamm

From: "Greg Wynn" <greg@vectormedia.com>
To: <russ@vectormedia.com>; <stephen@vectormedia.com>; <gregm989@aol.com>; "Jan Binder" <jan@vectormedia.com>
Sent: Friday, February 01, 2002 10:37 AM
Attach: N11 Fact Sheet.doc
Subject: Fwd: Abbreviated Dialing information

Well, we finally got the letter. The question is what to do now? I am still waiting to hear back from Joe Dicks - Nick Loader's attorney. I welcome all suggestions.

>From: "Flynn, Danny" <Danny.Flynn@BellSouth.com>
 >To: "'greg@vectormedia.com'" <greg@vectormedia.com>
 >Subject: Abbreviated Dialing information
 >Date: Fri, 1 Feb 2002 12:26:26 -0500
 >X-Mailer: Internet Mail Service (5.5.2653.19)
 >
 >
 >
 >Mr. Wynn:
 >
 >I have been inquiring with BellSouth Regulatory and BellSouth Product
 >Management
 >departments to try and determine if there is a product available to 511,
 >Inc. to replace
 >the abbreviated dialing plan now being recalled by the Federal
 >Communications Commission.
 >To date, I have not been able to find any product that can replace the
 >existing arrangement.
 >
 >Attached is a Fact Sheet from the FCC's website that addresses the FCC's
 >assignment and administration of the Abbreviated Dialing (N11) Codes. As
 >you can see from the attached, all abbreviated dialing codes are currently
 >in use or assigned to certain customer segments. In 1992, the FCC adopted
 >a Notice of Proposed Rulemaking (N11 NPRM) proposing that incumbent local
 >exchange carriers be required to provide abbreviated dialing
 >arrangements. Subsequent to the N11 NPRM, various parties asked the FCC
 >to designate N11 codes to facilitate network access to Telecommunications
 >Relay Service for individuals with hearing or speech disabilities, to
 >federal and state government services, and to non-emergency police
 >services. The FCC agreed and issued its N11 First Report and Order, the
 >Second Report and Order, and the Third Report and Order and Order on
 >Reconsideration. BellSouth has no current plans to provide an alternative
 >offering to those N11 customers who can no longer subscribe to Abbreviated
 >Dialing Service
 >due to the FCC's rulemaking.
 >

>Each State Public Service Commission has ruled on how this FCC request
>will be processed
>in their jurisdiction. My understanding is Florida will not require a
>Commercial account to give up their number until they receive a request
>for that specific number in the local calling area now covered by the service.

>
>It may be a good Idea for 511, Inc. to communicate their concerns with the
>Florida Public Service Commission or the FCC.

>
>As always, BellSouth would like to work with all our customers to meet
>their needs. If I can
>assist you in any way, please call me at (504) 846 - 7723.

>
>Sincerely,

>
>
>Danny Flynn Sr.
>Senior Account Executive
>BellSouth Business
>(504) 846 - 7723

>
> <<N11 Fact Sheet.doc>>

>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by 511, Inc.)
against BellSouth)
Telecommunications, Inc. and)
request for emergency relief)
_____)

Docket No. 020272-TL

I, Ellen Gache, hereby declare and state:

1. In 1996, I registered with the BellSouth Telecommunications, Inc. ("BellSouth") N11 lottery for the right and license to use certain N11 exchanges.
2. I was awarded the right and license to use the 511 exchange when it became available.
3. The 511 exchange became available for purchase/use in early 2000.
4. In early 2000, I contemplated forming a joint venture agreement with a new corporation called Dial 511, Inc. for purposes of operating and marketing the 511 exchange. The Dial 511, Inc. joint venture was never formed. Instead, I decided to form 511, Inc. in order to utilize the 511 exchange.
5. I sent a letter to BellSouth on or about May 17, 2000, notifying them of my intent to utilize 511, Inc. as the vehicle that would hold the rights to the 511 exchange. (A copy of this letter is attached hereto as Exhibit 1.)
6. Thereafter, BellSouth sent all correspondence to 511, Inc., as I had requested. (Representative samples of such correspondence are attached hereto as Exhibit 2.)
7. On or about May 24, 2000, 511, Inc. was incorporated in the State of Florida.

00050360.1

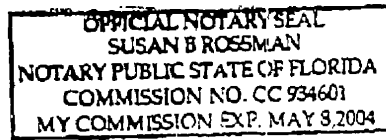
8. On or about July 3, 2000, the stock of S11, Inc. was sold to International Management Group ("IMG").

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of May, 2002 at Aventura, FL.
City State

Ellen Gache
Ellen Gache

Susan B. Rossman



00020860.1

Ellen Gache
3501 Keyser Avenue
Hollywood Fl. 33021
(954) 962-9626

May 17, 2000

Re: 511 Reservations
Bell South
Danny Flynn

Dear Mr. Flynn:

Enclosed is a copy of the award letters regarding my reservation of the telephone numbers 511 in Miami, Ft. Lauderdale, West Pam Beach, Jacksonville, Gainesville, Orlando, Pensacola and Panama City. Please be advised that the name of our corporation is 511 Inc. not Dial or Call 511 Inc. as previously indicated. Please make the necessary changes. Please fax copies of all the contracts to me at (954) 962-1628. In addition, if you have any questions regarding the same, I can be contacted at (954) 962-9626 or (954)980-0239.

Respectfully

Ellen Gache

Cc: Paul Larson, Price Waterhouse Coopers
Debbie Loftis, Bell South Telecommunications
Eric McCall< Bell South Telecommunications
Stuart Mirmelli, Esq.

PRICEWATERHOUSECOOPERS

PricewaterhouseCoopers LLP
1155 Peachtree Street
Atlanta GA 30309
Telephone (678) 419 1000
Direct phone (678) 419-1267
Direct fax (678) 419-1262

November 15, 2001

511, Inc.
Mr. Gregory S. Wynn
Suite 105
1625 E. Northern Avenue
Phoenix, AZ 85020

Dear Mr. Wynn:

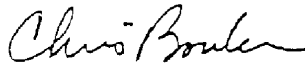
This letter is an official notification regarding your use of the 511 abbreviated dialing code in the Miami basic local calling areas (BLCA) in the State of Florida. As you are aware, the Federal Communications Commission issued order 00-256 (the Order) adopted July 21, 2000 regarding the use of 511 as a national abbreviated dialing code for access to traveler information services. In accordance with the Order, the following traveler information service agency has requested the assignment of the 511 abbreviated dialing code: Florida Department of Transportation. Pursuant to their request and in accordance with the Order, you are hereby notified that the 511 abbreviated dialing code in the State of Florida BLCA of Miami is officially assigned to the Florida Department of Transportation.

In accordance with Section A39 of BellSouth's General Subscriber Service Tariff (GSST) for the State of Florida, your organization will have six months from the date of this letter to vacate the use of this code. If you desire to move the service to a different abbreviated dialing code(s), if available, you must follow the established guidelines for formally requesting assignment of the abbreviated dialing code(s) for each specific BLCA (please note that each request for assignment of an abbreviated dialing code must be accompanied by an earnest money deposit in the form of a cashiers check or certified check). If there is not another abbreviated dialing code available, BellSouth will work with 511, Inc. to transfer the service to a different dialing arrangement, if technically and economically feasible. Please contact your account manager to assist you in the transition of your dialing arrangement.

Mr. Gregory S. Wynn
511, Inc.
November 15, 2001
Page 2

If you have any questions or concerns regarding this notification or the process forward, please feel free to contact either your local BellSouth account manager or myself at (678) 419-1267.

Respectfully,



Chris Bowler
Assurance and Business Advisory Services

cc: Mr. Stan Greer - BellSouth Telecommunications, Inc.
Ms. Sherry Bircheat - BellSouth Telecommunications, Inc.
Mr. Danny Flynn - BellSouth Telecommunications, Inc.
Mr. Robert Latimore - PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
1155 Peachtree Street
Atlanta GA 30309
Telephone (404) 870 1100
Facsimile (404) 870 1239
Direct phone (404) 870-1123
Direct fax (404) 870-1262

511, Inc.
Mr. Gregory S. Wynn
Suite 105
1625 E. Northern Avenue
Phoenix, AZ 85020

31 January 2001

Dear Greg:

This letter is to confirm our receipt of your request and official check (check # 936658128) in the amount of \$43,900 on behalf of 511, Inc. for abbreviated dialling (N11) service in the following basic local calling areas (BLCA) in the State of Florida:

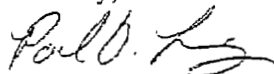
Code	BLCA
511	Boca Raton
	Delray Beach
	Sanford
	Melbourne
	Port St. Lucie
	Belle Glade
	Titusville
	Marathon
	DeBary

Your request for N11 service has resulted in the allocation of the 511 code in the BLCA indicated in the table above.

Please contact your BellSouth Account Representative to initiate the service request order to begin the process of establishing the service. The cashier's check will be submitted to Mr. Eric McCall of BellSouth Telecommunications, Inc. and will be applied to the charges associated with establishing the service.

If you have any questions regarding this confirmation and allocation or the process forward, please do not hesitate to contact me at (678) 419-1123 or Eric at (404) 927-8077.

Sincerely,



Paul D. Larson, Jr.
Assurance Business Advisory Services

PRICEWATERHOUSECOOPERS 

cc: Mr. Eric McCall, BellSouth Telecommunications, Inc.
Mr. Robert Lattimore, PricewaterhouseCoopers – Atlanta

511, Inc.
1625 E. Northern Avenue
Suite #105
Phoenix, Arizona 85020
(602) 944-1210

January 22, 2001

Mr. Paul Larson, Jr.
Assurance Buisness Advisory Services
Price Waterhouse Coopers LLP
1100 Campanile Building
1155 Peachtree Street
Atlanta, GA 30309

Dear Paul:

Please find our cashier's check enclosed for the amount of \$43,900.00 to Bell South along with our N11 Service Code Preference Form. Per Section A39 of BellSouth's General Subscriber Service Tariff, we are requesting the following areas:

Boca Raton	\$6,300
Delray Beach	\$6,300
Sanford	\$6,300
Melbourne	\$6,300
Port St. Lucie	\$6,300
Belle Glade	\$3,100
Titusville	\$3,100
Marathon	\$3,100
DeBary	\$3,100
Total Amount	\$43,900

If you need any additional information from us at this time, please do not hesitate to contact us. Thank you for your help and cooperation in this matter.

Sincerely,

511, Inc.

Russell A. Stamm
Gregory S. Wynn

Russell A. Stamm
Gregory S. Wynn
Principles

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 1

ISSUED: January 25, 2002
BY: Joseph P. Lacher, President -FL
Miami, Florida

EFFECTIVE: February 25, 2002

A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

A139.1 Three-Digit Dialing Service (N11)

(Obsoleted February 25, 2002, Type 4) Service and rates in this section are available for existing customers at existing locations only. Not available for new service, additions to existing service or moves of existing service to new locations.

A139.1.1 General

- A. Three-Digit Dialing Service (hereafter N11 Service) is a three-digit local dialing arrangement available in specified areas, with BellSouth Telecommunications, Inc. recording and rating of the call, for delivery of general information via voice grade facilities. (O)
- B. The N11 subscriber may apply a charge to his end users, within the N11 subscriber's local calling area, for services delivered in response to calls to an N11 number. The Company will record and rate these calls on behalf of the Company's N11 subscriber only. (O)
- C. For the purposes of handling (recording) of end user calls to an N11 provider, the Company will provide call detail for rating of N11 calls by the Competitive Local Exchange Carrier (CLEC) as defined in the Resale Agreement. (O)
- D. The Local Calling Area of the N11 Service subscriber will be the basic Local Calling Area defined in A3.3 of this Tariff, as facilities permit. (O)

N11 Service will be made available in the following Basic Local Calling Areas:

Basic Local Calling Areas	
Tier 1	Ft. Lauderdale, Miami
Tier 2	Daytona Beach, Jacksonville, Orlando, Pensacola, West Palm Beach
Tier 3	Brooksville, Gainesville, Melbourne, Panama City, Port St. Lucie
Tier 4	Belle Glade, Bunnell, Chipley, Key Largo, Lake City, Pierson, Pomona Park, St. Augustine, Sugarloaf Key

- E. Where conditions permit, Extended N11 service may be provided to include single exchanges in an existing N11 Basic Local Calling Area. At the N11 subscriber's option, the following Basic Local Calling Areas may be Extended to include the following Exchanges: (O)

Basic Local Calling Area:	Extended Exchanges
West Palm Beach	Boca Raton
West Palm Beach	Delray Beach
Key Largo	Marathon
Melbourne	Titusville
Orlando	DeBary
Orlando	Geneva
Orlando	Sanford

For purposes of application of Service Establishment charges, the above exchanges are assigned to tiers as follows:

Exchange	
Tier 3	Boca Raton, Delray Beach, Sanford
Tier 4	DeBary, Geneva, Marathon, Titusville

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 2

ISSUED: January 25, 2002

EFFECTIVE: February 25, 2002

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

A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)(T)

A139.1.1 General (Cont'd)

(O)(T)

- F.** N11 Service will be assigned for commercial use in each local calling area, only in those instances where the codes has not been requested by an entity as defined by the Federal Communications Commission in CC Docket 92-105 for specific uses. The specific uses are as follows: (O)
- 211 - access to community information and referral services (O)
 - 311 - access to non-emergency police and other government services (O)
 - 411 - directory assistance (O)
 - 511 - access to travel information services (O)
 - 611 and 811 - access to service repair and business office uses of al providers of telephone exchange service (O)
 - 711 - access code to Telephone Relay Services (TRS) (O)
- With this assignment, non-commercial use of 211, 511 and 711 will be provided as specified in Section A13. of this Tariff. In addition, guidelines for reassignment of N11 codes are defined in *A139.1.2.D*. (O)(T)
- G.** Only one N11 number will be assigned to an N11 subscriber or its affiliates per local calling area. (O)
- H.** An "affiliate" (as used in *A139.1*) of an N11 subscriber is any entity that directly, or indirectly through one or more intermediaries, controls, is controlled by, or is under common control with, the N11 subscriber. The term "control" (including the terms "controlling", "controlled by", and "under common control with") means the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of an entity, whether through the ownership of voting securities, by contract, or otherwise. (O)(T)
- I.** If the Company provides billing on behalf of the subscriber, the rules and regulations for Billing and Collection Services as defined in Section A37. of this Tariff, as well as the rules and regulations as defined in this Section will apply. (O)
- 1. Billing and Collection Services as defined in Section A37. of this Tariff, will only apply to N11 service where the N11 provider is a Company subscriber. (O)
 - 2. The Company will provide billing on behalf of the N11 subscriber, only when the end user is a BellSouth local exchange customer. (O)
- J.** N11 Service is available in BellSouth Territory only. To provide access to an N11 number to end users in an independent company territory or to a CLECs end user within the local calling area, the N11 subscriber must make appropriate arrangements with the independent company or CLEC serving that territory. (O)
- K.** N11 Service can be delivered via regular exchange access lines (by individual business lines, PBX trunks, etc.). (O)
- L.** This service is furnished subject to the availability of N11 numbers. (O)
- M.** Limitations and use of service as stated in Section A2. of this Tariff apply. (O)
- N.** Calls to a disconnected N11 number will be routed to intercept over the announcement facilities for a maximum of 60 days, when the N11 provider is a Company subscriber. The announcement provided may refer the caller to another telephone number. *Additional requirements and/or conditions as specified in A139.1.2.D of this tariff apply.* (O)(T)
- O.** Directory Listings may be provided for N11 Service at rates and regulations as specified in Section A6. of this Tariff. The phrase "Charges May Apply" will be included in the N11 Service listing at no additional charge. (O)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)(T)

A139.1.1 General (Cont'd)

(O)(T)

P. Access to N11 Service is not available to the following classes of service:

(O)

- Payphone Service Provider Telephones (PSPs)

(O)

- Hotel/Motel/Hospital Service

(O)

- 1+

(O)

- 0+, 0- (Credit Card, Third-Party Billing, Collect Calls)

(O)

- Inmate Service

(O)

- 101XXXX

(O)

- Four-party Stations

(O)

- Cellular - Type 2A

(O)

In addition, operator assisted calls to an N11 subscriber will not be completed.

(O)

Q. N11 Service will not provide calling number information in real time to the N11 subscriber. If the N11 subscriber needs this type of information, the N11 subscriber must subscribe to a compatible Calling Number Identification service in Section A13. of this Tariff, as available.

(O)

R. The N11 subscriber is restricted from selling or transferring the N11 number to an unaffiliated entity, either directly or indirectly.

(O)

S. If an N11 subscriber becomes an affiliate of or is acquired by another N11 subscriber through merger, acquisition, or otherwise, then the affiliated subscribers must surrender all but one N11 number within 90 days of the merger or acquisition.

(O)

T. If local calling areas are merged, and an N11 number exists in both areas, the N11 subscriber who established the N11 Service first in time will be entitled to retain the N11 Service in the merged local calling area.

(O)

U. The N11 subscriber is prohibited from providing programming which involves live group interaction, such as "GAB" lines, "chat" lines, or similar type programs where the primary purpose is for callers to interact with one another.

(O)(T)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)(T)

A139.1.2 Service Requirements and Conditions

(O)(T)

A. All requests for N11 Service must be submitted in writing to the independent firm designated by the Company for assignment of N11 numbers. The independent firm will allocate N11 Service numbers in the specified Basic Local Calling Areas pursuant to non-discriminatory procedures approved by Company. An earnest money deposit must be included with the written request for N11 Service, except for a request by Law Enforcement, as identified in FCC Order No. 97-51, issued February 19, 1997, for 311. This deposit should be in the form of a certified or cashiers check in the amount of the nonrecurring charge for N11 Service establishment in the Basic Local Calling Area for which the customer is requesting service. If the customer is assigned a N11 Service number, the deposit will be applied to the customer's charges for establishing N11 Service. If the customer is not assigned a N11 Service number, the check will be returned to the customer. The Company will not pay interest on the earnest money deposit.

(O)

B. Within 30 calendar days of the number assignment, the N11 subscriber must initiate a service request order which will determine the subscriber's provisioning date. The Company will provision the subscriber's order within a reasonable time, given the complexity of the order. The N11 subscriber will be billed the nonrecurring charge when the service is provisioned by the Company.

(O)

If, during or at the end of this 90-day period, the N11 subscriber has failed to establish service or decides to discontinue service establishment, the N11 number will be recalled and the number will be considered available for reassignment as specified in A. preceding. If the network has been provisioned for the subscriber, the nonrecurring charge will not be refunded or waived.

(O)

A minimum usage charge becomes effective 6 months after the service has been initially provisioned. Once it becomes effective, this charge will be billed to the N11 subscriber for any billing period in which the N11 subscriber's usage charges fall below the amount of the Minimum Usage Charge in *A139.1.7* of this Tariff. The transfer of an N11 number to an affiliate, whether through merger, acquisition, or otherwise, will not toll or restart the counting of the 6 months period during which the minimum usage charge does not apply.

(O)(T)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(OXT)

A139.1.2 Service Requirements and Conditions (Cont'd)

(OXT)

- C. The N11 subscriber must either (1) obtain a new 7 or 10-digit number, (2) designate an existing non-published 7 or 10-digit number, or (3) change an existing published 7 or 10-digit number to a non-published number, which will be established as the lead number in the hunt group, ACD, etc., of the subscriber. This 7 or 10-digit number must be non-published. When the N11 Service is disconnected or discontinued, the N11 subscriber must surrender this 7 or 10-digit number as part of the N11 Service. This 7 or 10-digit number can be either disconnected or a new 7 or 10-digit number can be assigned. Appropriate rates from Sections A3. and A4. of this Tariff will apply. (O)
- D. The Federal Communications Commission (FCC) has ordered that certain N11 numbers be assigned for national purposes and certain uses. As requests are submitted by qualifying entities for N11 numbers assigned for national use, the Company will update the Tariff accordingly and inconsistent commercial uses of such numbers shall be discontinued according to the following provisions. (O)
- The N11 subscriber must, prior to provisioning of the service, sign a written acknowledgement of this condition and an agreement to return the code upon receipt of 6 months written notice of such a recall from the Company and abide by all terms and conditions contained in Order 97-51, issued by the FCC in CC Docket 92-105 regarding the use and return of such N11 codes. If a recall is effected, the Company will work with all N11 subscribers affected by such recall to transfer their service arrangements, if technically and economically feasible at the time, to an abbreviated dialing arrangement, and if not feasible, to a seven-digit dialing arrangement within the 6-month notice period. *No additional intercept routing will be provided beyond the end of the 6-month notice period. The number will be available for immediate reassignment. The N11 subscriber will be required to migrate to any standard access arrangement for information services subsequently agreed to by the industry and approved by the FCC. The N11 subscriber will be charged the appropriate tariff rates or lower rates established on an individual case basis for the establishment of the new access arrangement.* (OXT)
- E. The N11 Service is provided where facilities permit. (O)
- F. N11 subscribers should work separately with cellular companies to ascertain whether Type I cellular customers will be able to reach information services provided by dialing an N11 number. Charges for calls to the N11 number made from cellular end users will be billed to the cellular company. This may require the N11 subscriber to enter into a contractual agreement with the cellular company to provide 3-digit access service and the billing associated with the service. (O)
- G. N11 subscribers should work separately with competitive local exchange companies to ascertain their end user customers will be able to reach information services provided by dialing an N11 number. The CLEC company will bill charges for calls to the N11 number made from CLEC end users. This may require the N11 subscriber to enter into a contractual agreement with the CLEC company to provide 3-digit access service and the billing associated with the service. (O)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)(T)

A139.1.2 Service Requirements and Conditions (Cont'd)

(O)(T)

H. N11 Service will be provided under the following conditions.

(O)

1. For network sizing and protection, each N11 subscriber must provide an estimate of annual call volumes, the expected busy hour and holding time for each call to an N11 number.
2. The customer will subscribe to adequate telephone facilities initially and subsequently as may be required, in the judgment of the Company, to adequately handle calls to N11 numbers without impairing the Company's general telephone service or telephone plant. The customer may be required further to bear the expense of traffic load protection equipment when, in the judgment of the Company, such would be required as a protection to the general telephone service or telephone plant during temporary periods of traffic overload.
3. The Company report of the number of local calls completed to each N11 number will serve as the sole document upon which remittance will be made. In the event the Company's charges for calls exceed the revenue from billed calls, the subscriber will be liable for payment of the difference to the Company. Nonpayment of the N11 call billing by the end user shall not be cause for denial or termination of the end user's exchange telephone service.
4. The N11 subscriber is responsible for obtaining all necessary permission, licenses, written consents, waivers and releases and all other rights from all persons whose work, statements or performance are used in connection with the service, and from all holders of copyrights, trademarks, and patents used in connection with said service.
5. The N11 subscriber shall be liable for, and shall indemnify, protect, defend and save harmless the Company against all suits, actions, claims, demands and judgments, and of all costs, expenses and counsel fees incurred on account thereof, arising out of and resulting directly or indirectly from the Service or in connection therewith, including, but not limited to, any loss, damage, expense or liability resulting from any infringement or claim of infringement, of any patent, trademark, copyright, or resulting from any claim of liable and slander.
6. Suspension of Service as covered in Section A2. of this Tariff is not applicable for this service.
7. When N11 Service is disconnected all remittance money due to the N11 subscriber may be credited or applied to the final bill issued for the recurring charges associated with this Tariff.
8. If an N11 subscriber discontinues subscription to N11 Service, the N11 number will be disconnected and reassigned according to the conditions defined in A. preceding. Upon the termination of N11 Service, the N11 number may be reassigned after 60 days. *Additional requirements and/or conditions as specified in A139.1.2.D of this tariff apply.*
9. Unless otherwise specifically provided in this Tariff, the Company shall be authorized to disconnect any tariffed service provided to the N11 subscriber utilized, directly or indirectly, with the N11 Service which fails to comply with regulations and conditions set forth herein, upon five (5) days notice to the subscriber. Disconnection may be suspended at the discretion of the Company if it receives written certification that the N11 subscriber is in compliance with regulations and conditions of the tariffs. Continual noncompliance shall be cause for disconnection without notice at the discretion of the Company.

(O)

(O)

(O)

(O)

(O)

(O)

(O)(T)

(O)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)(T)

A139.1.2 Service Requirements and Conditions (Cont'd)

(O)(T)

H. N11 Service will be provided under the following conditions. (Cont'd)

(O)

10. The N11 subscriber is responsible for informing potential end users that a call to the N11 number will be at the charge the subscriber establishes and if applicable, will be billed by the Company for calls from within the N11 subscriber's local calling area. The N11 subscriber must notify the Company in writing at least 30 days in advance if the call charge is to be increased or decreased. Such charge shall begin on the date requested by the N11 subscriber. As a result, the N11 end user bills may show calls to the N11 number at different rates during the same billing period. (O)
11. If the Company provides billing for N11 Service, billing entries to appear on the end user's bill must be specified by the N11 subscriber, as provided Section A37. of this Tariff. A telephone number must also be provided for printing on the bill for end user inquiry purposes. (O)
12. The Company will rate the calls from end users of the N11 subscriber one charge per call to the N11 number. (O)
13. The N11 subscriber shall subscribe to adequate exchange facilities to transport the calls to the N11 subscriber's premises. (O)
14. The Company will not be responsible for recording and rating those calls that by-pass the N11 routing. (O)
15. The N11 subscriber shall provide appropriate answer supervision for a minimum two-second duration for all calls completed to the N11 subscriber to ensure proper recording and rating for the service. (O)
16. When end users are charged for services delivered in response to calls to an N11 number, the N11 subscriber must provide a preamble at the beginning of each N11 Service call, stating the charge for the N11 Service call. The N11 subscriber's preamble on all calls where there is a potential for minors (defined as under 18 years of age) to be attracted to the program, must provide clear and conspicuous notification in language understandable to children of the requirement to obtain parental permission before placing or continuing with the call. The preamble message must be given within 15 seconds and must be followed by a 3 second period within which the caller can hang up without being charged the N11 Service charge for the call. The N11 subscriber may allow a caller to affirmatively bypass a preamble. However, if the period of time from off-hook condition to on-hook condition is 18 seconds or less, the N11 Service charge will not be recorded or rated. In those instances where the call is likely to exceed the maximum \$10.00 rate level specified in .21 following, the preamble must advise the caller that an additional call may be required to complete the transaction. (O)
17. Children's programs shall not have rates in excess of \$10.00 per call, and shall not include the enticement of a gift or premium. (O)
18. No N11 subscriber shall promote N11 Service with the use of an autodialer or broadcasting of tones that dial an N11 number. (O)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(OXT)

A139.1.2 Service Requirements and Conditions (Cont'd)

(OXT)

H. N11 Service will be provided under the following conditions. (Cont'd)

(O)

19. The N11 subscriber must prominently disclose the additional cost per minute or per call for any other telephone number i.e. 700, 800, 900, 976, that the caller is referred to either directly or indirectly.

(O)

20. The N11 subscriber will charge callers to the N11 number a rate that does not exceed a maximum of \$10.00 per call. In those cases where N11 subscribers rate their own calls, prior to the termination of a call which has reached the maximum \$10.00 rate level, a caller will be advised that he must terminate the call and initiate another call which may not require the caller to hear the preamble provided for the initial call. The maximum rate of \$10.00 per call will apply to all subsequently initiated calls placed following the original call.

(OXT)

21. The N11 subscriber shall respond promptly to any and all complaints lodged with any regulatory authority against any service provided via the N11 number. If requested by the Company, the N11 subscriber shall assist the Company in responding to complaints made to the Company concerning the subscriber's N11 service.

(OXT)

22. A written notice will be sent to any N11 subscriber following oral notification when their service unreasonably interferes with or impairs other services rendered to the public by the Company or by other subscribers of N11 Service. If after notification the subscriber makes no modification in method of operation or in the service arrangements that are deemed service-protective by the Company, or if the subscriber is unwilling to accept the modifications, or if the subscriber continues to cause service impairment, the Company reserves the right, at any time, without further notice, to institute protective measures, up to and including termination of service. In an emergency situation as defined by the Company, the Company reserves the right, at any time, without notice, to institute protective measures, up to and including termination of service.

(OXT)

I. If a pre-recorded announcement is provided by the N11 subscriber, the following conditions apply.

(O)

1. The N11 Service subscriber will provide announcements. The Company will provide only the delivery of the call.

(O)

2. N11 Subscriber sponsorship of any particular announcement of recorded program service shall not preclude another N11 subscriber from sponsoring the same or similar announcement or recorded program service.

(O)

3. The provision of access to the N11 Network by the Company for the transmission of announcement or recorded program services is subject to availability of such facilities and the requirements of the local exchange network.

(O)

4. The N11 subscriber assumes all financial responsibility for all costs involved in providing announcement or recorded program services including, but not limited to, the recorder-announcement equipment producing the recording, advertising and promotional expenses.

(O)

5. The N11 subscriber assumes, according to other specific rates and charges under tariff, all financial responsibility for all facilities required to connect the recorder-announcement equipment located on the subscriber's premises.

(O)

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(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)X(T)

A139.1.2 Service Requirements and Conditions (Cont'd)

(O)X(T)

- J. The Company may take all legal and practical steps to disassociate itself from N11 subscribers providing services whose business and/or public conduct (whether demonstrated or proposed) is of a type that generates unacceptable levels of complaints by end users. (O)
- K. In no event shall the Company be liable for any losses or damages of any kind resulting from the unavailability of its equipment or facilities or for any act, omission or failure of performance by the Company, or its employees, or agents, in connection with this Tariff. The Company shall not be responsible for calls that cannot be completed as a result of repair or maintenance difficulties on Company facilities and equipment nor on equipment owned or leased by the subscriber. (O)
- L. The N11 Service subscriber must be located within the principal exchange of the Basic Local Calling Area in which he subscribes to N11 Service. (O)
- M. If the N11 Service subscriber also subscribes to the Company's Billing and Collection service, the subscriber may choose itemized billing or aggregate billing to the end user. Itemized billing will print on the end user's bill a separate line identifying each call made to the N11 Service number. Aggregate billing will print on the end user's bill one line to indicate the total number of calls made to the N11 Service number and the total amount of the charges for those calls. (O)

A139.1.3 Obligations of the Competitive Local Exchange Carrier

(O)X(T)

- A. In those instances where a CLEC assumes responsibility for an N11 subscriber, all terms and conditions defined in this Tariff and in their Resale Agreement will apply with the exceptions of: (O)
 - 1. Billing on behalf of the N11 subscriber is the responsibility of the CLEC. Billing and Collections as defined in A37. of this Tariff, will not apply to N11 services where the N11 provider is a CLEC's subscriber. (O)
 - 2. When the N11 Service is disconnected or discontinued, the N11 Provider must surrender the 7 or 10-digit number as defined in A139.1.2.C. preceding. (O)X(T)
- B. In those instances where a CLEC provides N11 service to its end user within the local calling area, terms and conditions for N11 service are as defined in the appropriate Interconnection Agreement. (O)
 - 1. For purposes of providing a CLEC end user access to an N11 provider within the local calling area, appropriate arrangements must be made by the CLEC with the N11 provider serving the local calling area. (O)
 - 2. A CLEC may negotiate the provision of directory listings as defined in their Interconnection Agreement. (O)

A139.1.4 Advertisement Regulations for N11 Service

(O)X(T)

- A. All advertising inviting the use of or in any way relating to N11 Service shall conform to and comply with the requirements and conditions contained herein as well as all other applicable tariff provisions, rules, ordinances, laws and statutes. (O)
- B. The advertising for N11 Service shall comply with the following regulations. (O)
 - 1. Advertising may be distributed in any form that the subscriber chooses, provided it complies with and conforms to the specifications contained herein. (O)
 - 2. No advertising shall be permitted which, in form or substance, does not allow for an audit trail which is verifiable independent of the subscriber for review and confirmation, at any given moment, of compliance with the procedures and specifications set out herein, as well as in other applicable tariff provisions. (O)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)(T)

A139.1.4 Advertisement Regulations for N11 Service (Cont'd)

(O)(T)

- C. Each advertisement shall inform potential callers of the name of the person responsible for the advertisement, the charge for N11 calls, and if billing is provided by the Company, that the charge will appear on the telephone bill from which the call is placed. This information shall be displayed with such clarity and prominence to permit it to be noticed and understood by prospective callers. In order to ensure that callers will have an adequate opportunity to notice and understand the foregoing information, advertisements inviting the use of or in any way relating to N11 Service will, at a minimum, be conducted in compliance with the following media-specific specifications. (O)
1. Print Media - Notice of the charge for each N11 call and, when applicable, the fact of inclusion of this charge on the telephone bill, and the telephone number of the person responsible for the advertisement shall appear on the face of any printed material, in BOLD type (if BOLD type is permitted by the advertising medium; if BOLD type is not permitted, the same type as used in the remainder of the advertisement shall be used) of a size no smaller than the largest type contained elsewhere in the advertisement. (O)
 2. Audio or Verbal Media - Notice of the charge for each N11 call and, when applicable, the fact of the inclusion of the charge on the telephone bill shall be stated once during audio or verbal advertisements. This portion of the advertisement shall be broadcast at the same audio level with the same diction and pace as the remaining portions of the ad. (O)
 3. Audio/Visual - Notice of the charge for each N11 call and, when applicable, the fact of inclusion of these charges on the telephone bill, and the person responsible for the advertisement shall be both displayed/broadcast during any audio/visual advertisement. When displayed, this information shall be shown for the same duration as the N11 Service number is shown, each time the N11 Service number is shown. In all other respects, the advertisement shall conform to the specifications for print advertisements and audio or verbal advertisement set out in 1. and 2. preceding. (O)
- D. In addition to complying with the procedures stated preceding and all other specifications relating to the advertisement of the charge and bill consequences associated with N11 Service, each N11 subscriber shall comply with the following: (O)
1. The N11 subscriber shall exclude from any advertisement any matter the dissemination of which is prohibited by law. No advertisement shall be used which, because of words, phrases, statements or illustrations therein or information omitted therefrom, has the capacity or tendency to mislead or deceive prospective callers as to the cost, extent, quality, caller's qualification or nature of any information or service to be received from an N11 call. The N11 subscriber shall respond promptly to any and all complaints lodged with any regulatory authority regarding advertisement for N11 Service. If requested by the Company, the N11 subscriber shall assist the Company in responding to complaints to the Company concerning advertisements for N11 Service. (O)
 2. Where detailed and complete information concerning the N11 Service is prominently displayed in a publication, other references to the N11 Service within that publication need not repeat all of the information so long as each other reference clearly reflects that there is a charge for dialing the N11 Service number and where the complete information is located. (O)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd)

(O)(T)

A139.1.5 N11 Service Monthly Report

(O)(T)

- A. The N11 Service Monthly Report is a monthly record of terminating traffic to the N11 subscriber per local calling area. The information in this report will include the calling telephone number, date, time of day, call duration of each call received, and the rate to be charged for the call. (O)
- B. The N11 Service Monthly Report will be provided via paper copy or diskette, where available, to the N11 subscriber. (O)
- C. The N11 Service Monthly Report will be offered where facilities permit and where the Company's message billing process has been arranged to provide this optional feature. (O)
- D. The N11 Service Monthly Report is not represented to be a provision of billing detail. (O)
- E. Telephone numbers listed in the N11 Service Monthly Report are intended solely for the use of the N11 subscriber. Resale of this information is prohibited by this Tariff. (O)
- F. The N11 Service Monthly Report will only apply to N11 services where the N11 provider is a Company subscriber. (O)

A139.1.6 N11 Service Call Detail Information

(O)(T)

- A. N11 Service Call Detail Information is offered for N11 subscribers that provide billing for the N11 Service. This information is a monthly record of terminating traffic to the N11 subscriber per local calling area. The information will include the calling telephone number, date, time of day, call duration of each call received, and the rate to be charged for the call. (O)
- B. The N11 Service Call Detail Information will be provided via diskette in ASCII format to the N11 subscriber. (O)
- C. The N11 Service Call Detail Information will be offered where facilities permit and where the Company's message billing process has been arranged to provide this feature. (O)
- D. The N11 Service Call Detail Information is not represented to be a provision of billing detail. (O)
- E. Telephone numbers listed in the N11 Service Call Detail Information are intended solely for the use of the N11 subscriber. Resale of this information is prohibited by this Tariff. (O)
- F. The N11 Service Call Detail Information will only apply to N11 services where the N11 provider is a Company subscriber. (O)

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A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING (N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd) (O)(T)

A139.1.7 Rates and Charges (O)(T)

A. Application of Rates (O)

1. Nonrecurring charges shall apply for each N11 number per local calling area. (O)
2. If the Company provides billing, charges for using the Billing and Collection Services as stated in Section A37. of this Tariff will apply. (O)
3. N11 subscribers will pay the normal tariffed charges for the local exchange access arrangements (e.g., PBX trunks, Centrex Type Services lines, etc.) used for transporting and terminating messages at the N11 subscriber's designated premises. (O)
4. Applicable service order charges as specified in Section A4. of this Tariff will apply, in addition to the following rates. (O)
5. A charge will apply to changes to the billing arrangement at the subscriber's request. Such changes may be one of the following: a change in rate to the end user for an N11 Service call, or a change of subscriber name or telephone number provided on the end user's bill. (O)
6. A Minimum Usage Charge will be billed to the N11 subscriber in each billing period, following the 6-month period after the service has been provisioned, in which the N11 subscriber's usage charges fall below the amount of the Minimum Usage Charge in B.5. following. (O)
7. Extended N11 Service is provided from exchanges as indicated in *A139.1.1.C*. A monthly charge applies per business line or PBX trunk to the N11 subscriber in addition to the regular monthly charges for business lines or PBX trunks in Section A3. of this Tariff. Toll charges to N11 codes do not apply from extended N11 exchanges when the N11 subscriber subscribes to the Extended N11 service option; however, usage charges as specified in *A139.1.6.B.4*. will apply on these N11 calls. (O)(T)

B. Charges applicable to the N11 Service Subscriber: (O)

1. Establishment of N11 Service, per N11 Service number, per Local Calling Area			(O)
	Nonrecurring Charge	USOC	(O)
(a) Tier 1	\$30,000.00	NA	(O)
(b) Tier 2	16,500.00	NA	(O)
(c) Tier 3	6,300.00	NA	(O)
(d) Tier 4	3,100.00	NA	(O)
2. Billing Arrangement Change by Subscriber			(O)
(a) Per N11 Service Number, per Local Calling Area	675.00	N11NS	(O)
3. Change of Point-to-Number by Subscriber, Per Local Calling Area			(O)
(a) Tier 1	1,500.00	N11AP	(O)
(b) Tier 2	400.00	N11NP	(O)
(c) Tier 3	220.00	N11NQ	(O)
(d) Tier 4	60.00	N11NR	(O)

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA

GENERAL SUBSCRIBER SERVICE TARIFF

ISSUED: January 25, 2002
BY: Joseph P. Lacher, President -FL
Miami, Florida

EFFECTIVE: February 25, 2002

A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING (N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd) (O)(T)

A139.1.7 Rates and Charges (Cont'd) (O)(T)

B. Charges applicable to the N11 Service Subscriber: (Cont'd) (O)

4. Usage Charges (O)

	Nonrecurring Charge	Monthly Rate	USOC	
(a) Per message rate	5.15	\$.10	NA	(O)
(b) Per minute charge for each message minute in excess of 5 minutes		\$.02	NA	(O)

5. Minimum Usage Charge, per N11 Service Number, per Local Calling Area (O)

	Monthly Minimum Charge	USOC	
(a) Tier 1	\$3,300.00	NA	(O)
(b) Tier 2	1,000.00	NA	(O)
(c) Tier 3	500.00	NA	(O)
(d) Tier 4	100.00	NA	(O)

6. N11 Service Monthly Report (O)

	Nonrecurring Charge	Monthly Rate	USOC	
(a) Per Occasion, Per Local Calling Area	\$450.00	\$46.50	N11MR	(O)
(b) Per Message, each		\$.005	NA	(O)

7. N11 Call Detail Information¹ (O)

	Nonrecurring Charge	Monthly Rate	USOC	
(a) Per Occasion, Per Local Calling Area	\$450.00	\$75.00	N11SB	(O)

Note 1: Customers who subscribe to the N11 Service Monthly Report in paper format and who subsequently convert to the N11 Call Detail Information option will not be billed the associated nonrecurring charge. (O)

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 14

ISSUED: January 25, 2002

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

A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING (N)

A139.1 Three-Digit Dialing Service (N11) (Cont'd) (O)(T)

A139.1.7 Rates and Charges (Cont'd) (O)(T)

B. Charges applicable to the N11 Service Subscriber: (Cont'd) (O)

8. Extended N11 Service Option (O)

	Monthly	USOC	
	Rate		
(a) Boca Raton, per business line or PBX trunk	\$10.60	N11EB	(O)
(b) Delray Beach, per business line or PBX trunk	10.15	N11ED	(O)
(c) DeBary, Marathon, per business line or PBX trunk	9.30	N11EM	(O)
(d) Sanford, Titusville, per business line or PBX trunk	9.75	N11ET	(O)
(e) Geneva, per business line or PBX trunk	8.85	N11EG	(O)

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA
ISSUED: January 25, 2002
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Miami, Florida

GENERAL SUBSCRIBER SERVICE TARIFF

Original Page 1

EFFECTIVE: February 25, 2002

A139. OBSOLETE SERVICES OFFERINGS - ABBREVIATED DIALING

(N)

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KLEIN, ZELMAN, ROTHERMEL & DICHTER, L.L.P.

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February 27, 2002

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

James Meza, III, Esq.
BellSouth Telecommunications Legal Department
150 West Flagler Street, Suite 1910
Miami, FL 33130

Re: Miami Basic Calling Areas - 511 Abbreviated Dialing Code

Dear Mr. Meza:

I write on behalf of our client, 511, Inc., in response to correspondence received by our client on November 15, 2001, from PriceWaterhouseCoopers LLP, regarding the assignment of the 511 Abbreviated Dialing Code in the Miami Basic Local Calling Areas ("BLCAs") to the Florida Department of Transportation.

Pursuant to Section A39.1.2 (D) of the BellSouth Telecommunications, Inc. ("BellSouth") Florida State General Subscriber Service Tariff ("GSST"), in the event that an Abbreviated Dialing Code is recalled, BellSouth must transfer affected N11 subscribers to an alternative abbreviated dialing arrangement, if technically and economically feasible. Absent proof that such transfer is not technically and economically feasible, an alternative N11 Code must be assigned. Where transfer to an alternative abbreviated dialing arrangement is not feasible, a seven-digit dialing arrangement must be provided to the affected N11 subscriber.

511, Inc. has corresponded with BellSouth repeatedly over the past few months concerning the assignment of an alternative Abbreviated Dialing Code and, if not feasible, a seven-digit dialing arrangement. BellSouth has maintained that it "has no current plans to provide an alternative offering to those N11 customers who can no longer subscribe to Abbreviated Dialing Services due to the FCC's rulemaking." (See attached e-mail correspondence from Mr. Danny Flynn, Sr., BellSouth Senior Account Executive, dated

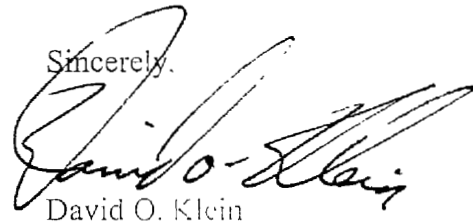
Mr. James Meza, III, Esq.
February 27, 2002
Page 2

February 1, 2002). As to the option of assigning a seven-digit dialing arrangement, BellSouth has maintained that such an alternative arrangement would not succeed as BellSouth does not have the technical ability to identify the Automatic Number Identification ("ANI") of the calling party that would allow BellSouth to properly bill customers on behalf of 511, Inc.

On behalf of 511, Inc., by and through this correspondence, we hereby demand that BellSouth provide acceptable documented proof that transfer to an alternative abbreviated dialing arrangement is not technically and economically feasible. Absent production of same, an alternative N11 Code must be immediately assigned to 511, Inc. Should BellSouth produce acceptable documentation demonstrating that the assignment of an alternative abbreviated dialing code is not technically and economically feasible, BellSouth *must*, in accordance with the provisions of the GSST, provide 511, Inc. with a seven-digit dialing arrangement. In the event that BellSouth does not immediately comply with these demands in accordance with its obligations under the GSST, 511, Inc. will pursue any and all remedies available at law and in equity.

I look forward to your prompt response.

Sincerely,

A handwritten signature in black ink, appearing to read "David O. Klein", written over the word "Sincerely,".

David O. Klein

jls/2166/49457

cc: Chris Bowler - PriceWaterhouseCoopers LLP
Danny Flynn, Sr. - BellSouth

>From: "Flynn, Danny" <Danny.Flynn@BellSouth.com>
>To: "greg@vectormedia.com" <greg@vectormedia.com>
>Subject: Abbreviated Dialing information
>Date: Fri, 1 Feb 2002 12:26:26 -0500
>X-Mailer: Internet Mail Service (5.5.2653.19)

>
>
>

>Mr. Wynn:

>

>I have been inquiring with BellSouth Regulatory and BellSouth Product
>Management

>departments to try and determine if there is a product available to 511,
>Inc.to replace

>the abbreviated dialing plan now being recalled by the Federal
>Communications Commission.

>To date, I have not been able to find any product that can replace the
>existing arrangement.

>

>Attached is a Fact Sheet from the FCC's website that addresses the FCC's
>assignment and administration of the Abbreviated Dialing (N11) Codes. As
>you can see from the attached, all abbreviated dialing codes are currently
>in use or assigned to certain customer segments. In 1992, the FCC adopted
>a Notice of Proposed Rulemaking (N11 NPRM) proposing that incumbent local
>exchange carriers be required to provide abbreviated dialing

>arrangements. Subsequent to the N11 NPRM, various parties asked the FCC
>to designate N11 codes to facilitate network access to Telecommunications
>Relay Service for individuals with hearing or speech disabilities, to
>federal and state government services, and to non-emergency police
>services. The FCC agreed and issued its N11 First Report and Order, the
>Second Report and Order, and the Third Report and Order and Order on
>Reconsideration. BellSouth has no current plans to provide an alternative
>offering to those N11 customers who can no longer subscribe to Abbreviated
>Dialing Service

>s due to the FCC's rulemaking.

>

>Each State Public Service Commission has ruled on how this FCC request
>will be processed
>in their jurisdiction. My understanding is Florida will not require a
>Commercial account to give up their number until they receive a request
>for that specific number in the local calling area now covered by the service.
>
>It may be a good Idea for 511, Inc. to communicate their concerns with the
>Florida Public Service Commission or the FCC.
>
>As always, BellSouth would like to work with all our customers to meet
>their needs. If I can
>assist you in any way, please call me at (504) 846 - 7723.
>
>Sincerely,
>
>
>Danny Flynn Sr.
>Senior Account Executive
>BellSouth Business
>(504) 846 - 7723
>
> <<N11 Fact Sheet.doc>>
>

KLEIN, ZELMAN, ROTHERMEL & DICHTER, L.L.P.
485 MADISON AVENUE
NEW YORK, NEW YORK 10022-5803

Mr. Danny Flynn, Sr.
Senior Account Executive
BellSouth
3300 West Esplanade Avenue, Suite 400
Metairie, LA 70002

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