



Florida Cable Telecommunications Association

Steve Wilkerson, President
(Via Hand delivery)

September 26, 2003

030000-70

Chairman Lila A. Jaber
Commissioner Braulio L. Baez
Commissioner Rudolph Bradley
Commissioner Charles M. Davidson
Commissioner J. Terry Deason
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

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RE: BellSouth VoIP Gateway Tariff
T-030555

Dear Commissioners:

The purpose of this letter is for the Florida Cable Telecommunications Association, Inc. (FCTA) and the Southeastern Competitive Carriers Association (SECCA) to comment briefly on BellSouth's new tariff offering, which, on an integrated basis, converts a VoIP signal to a format readily transportable on the public switched telephone network and transports such traffic on BellSouth's network. The FCTA and SECCA did not seek to oppose this tariff or suspend its operation. However, we would like to note that, given the non-traditional functionalities provided by this tariff, we do not believe the Commission should view the effectiveness of this tariff, the fact that it was filed within BellSouth's broader "access" tariff, or the particular rates included in it, as particularly relevant to the broader question of whether VoIP offerings should be subject to access charges as traditionally conceived and, if so, under what circumstances and at what rates.

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AUS _____ Thank you for your consideration of these comments.
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GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

Sincerely,

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel
Florida Cable Telecommunications Association

Wanda Montano
President
Southeastern Competitive Carriers
Association

MAG/mj

cc: By Hand Delivery

Blanco Bayo, Director, Commission Clerk and Administrative Services

Charles Hill, Director, Division of External Affairs

Roberta Bass, Bureau Chief, Office of Market Monitoring and Strategic Analysis

Beth Salak, Director, Division of Competitive Markets and Enforcement

Cynthia Miller, Bureau Chief, Office of Federal and Legislative Liaison

Greg Shafer, Senior Analyst, Office of Federal and Legislative Liaison

Sally Simmons, Bureau Chief, Bureau of Market Development

Jackie Gilchrist, Regional Analyst Supervisor, Bureau of Market Development