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October 14, 2005

Mrs. Blanca S. Bayó  
Director, Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 050421-TL: Petition by Florida Alliance of Information and Referral Services to initiate rulemaking to require local exchange telecommunications companies to include 211 information on inside cover of telephone directories**

Dear Ms. Bayó:

As requested in the FPSC Staff's September 22, 2005 workshop, BellSouth Telecommunications, Inc. ("BellSouth") provides the following written comments regarding the Florida Alliance of Information and Referral Services' Petition ("the Alliance") to initiate rulemaking. The petition requests that 211 information be placed on the inside front cover of telephone directories.

The abbreviated dialing code, 211, is utilized for access to community information and referral services. As stated in the Staff workshop, BellSouth currently provides 211 information on the inside front cover of the directory under "Other Important Numbers." The current process for adding 211 service to the directories consists of United Way sending a listing request to BellSouth. Upon receipt, the BellSouth liaison sends the request to the publishing company to add the listing to the "Other Important Numbers" page.

Because 211/United Way information (concerning actual wording and directories it should appear in) is provided by the local United Way office where that directory is published, BellSouth does not have a "standard" listing for the 211/United Way information. However, BellSouth stated it would like to work with the Alliance to add 211 language on the state template so that it appears in all directories in Florida versus individual directories. If a "standard" listing is to be utilized for the entire state, BellSouth needs confirmation that service is available in all of the areas covered by the directories.

Staff also asked the companies to comment on the inclusion of all N11 codes in the directories. BellSouth currently provides the following N11 codes in its directories. 911 information appears on the front inside cover, 211 under "other important numbers" (where it has been requested), 411 under directory assistance, and 711 under Florida relay center. While 611 is unassigned, it is generally used by carriers for repair and business office use. The other N11 codes 311, 511 and 811 are discussed below.

The 311 code was set aside by the FCC (by request of the Dept. of Justice) by order released February 19, 1997 to enable the public to gain access to non-emergency police and other government services. BellSouth is willing to provide the 311 listings for the entire state with verification from DOJ contacts. However, to our knowledge, 311 service has not yet been implemented statewide. As with the 211 service, 311 service has to be requested by the counties/cities in each area. As described above, BellSouth is willing to place the 311 information under "Other Important Numbers" in the directory; however, BellSouth would need a list of areas where 311 service is available. If possible, BellSouth would also like to place the 311 listing on a state template so that it would appear in all directories in Florida.

The 511 code is assigned for traffic and transportation information. BellSouth would also be willing to provide 511 information in the directory. However, as stated previously, BellSouth would have to confirm that 511 service is available in all of the areas covered by the directories.

The 811 code was set aside by the FCC by order released March 14, 2005 for providing advanced notice of excavation activities to underground facility operators as required by the Pipeline Safety Improvement Act of 2002. BellSouth is willing to provide the 811 listing statewide upon the completion of the implementation of Florida's "One Call" notification system on or before April 13, 2007.

Notwithstanding BellSouth's willingness to place the 211 code in the directories, BellSouth does not believe that a rule proceeding is the appropriate venue to proceed with the Alliance's request. BellSouth believes there are other avenues available prior to going to a rule proceeding. BellSouth was never contacted by the Alliance prior to the filing of their petition. We believe that BellSouth would have worked through this issue with the Alliance without having to engage the FPSC. Although BellSouth has stated its willingness to place the 211 code in the directories, BellSouth does not believe that additional requirements regarding the directories should be placed upon the company. BellSouth directories are no longer the only "show" in town. The provision of directories is a competitive business. For example, in addition to the directory published by BAPCO, there are at least four directories in Miami, and at least three directories in Jacksonville.

As indicated at the conclusion of the workshop, the Alliance was encouraged to contact the companies to work together on this issue. On October 6, 2005, as there had been no contact from the Alliance, BellSouth e-mailed Mr. Ted Granger (United Way of Florida) and Mr. Randy Nicklaus (211 Big Bend), who were attendees at the workshop. BellSouth did receive an inquiry from the Alliance on October 12, 2005, and is in the process of responding to the Alliance.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Gurdian', with a stylized flourish at the end.

Manuel A. Gurdian


cc: All Parties of Record  
Jerry D. Hendrix  
R. Douglas Lackey  
Nancy B. White

**CERTIFICATE OF SERVICE**  
**Docket No. 050421-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, (\*) and First Class U. S. Mail this 14th day of October, 2005 to the following:

Christina Moore  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
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Theodore G. Granger, President  
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Manuel A. Gurdian