

**REDACTED**

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**ORIGINAL**

November 15, 2006

Melinda Watts  
Bureau of Telecommunications Service Quality,  
Certification and Enforcement  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850

*undocketed*

RE: October 23, 2006 Request

Dear Ms. Watts:

This letter is in response to your October 23, 2006 letter requesting information regarding what actions BellSouth Telecommunications, Inc (BellSouth) is taking to ensure that charges from ILD Telecommunications, Inc. (ILD) are legitimate, as related to complaints the Florida Public Service Commission (the Commission) has received regarding Radical Persson, Inc., eChurch Network, and ILAB<sup>1</sup>.

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_

ECR \_\_\_\_\_

GCL \_\_\_\_\_

OPC \_\_\_\_\_

RCA \_\_\_\_\_

SCR \_\_\_\_\_

SGA \_\_\_\_\_

SEC   1  

OTH \_\_\_\_\_

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FPSC-COMMISSION CLERK

BellSouth will treat any such request as a request to add a new service program and ILD will be required to submit the following information:

- A detailed description of the service program, including:
  - Marketing and promotional methods, including placement plans
  - How end users order the service program, including telephone number(s), mailing address, and/or the web sites (URLs) end users will use to order the service program
  - Copy of actual post-sales fulfillment documentation
  - The information provided to the end user describing how the service program is accessed for utilization
  - The information provided to the end user describing how to terminate the service program
- The Carrier Identification Code (CIC) and Access Customer Name Abbreviation as well as the sub-CIC the service program will bill under
- A copy of the state certifications the carrier or sub-carrier received to provision the service program, if applicable
- Proof of the carrier's or sub-carrier's appropriate regulatory approval for billing such service program, if applicable
- The charge and credit Exchange Message Interface record types the carrier or sub-carrier will use
- The service name that will be used to market, sell and, when applicable, bill the service program to end users
- An explanation of all the applicable rates and charges, including the maximum charge/rate per unit for provisioning of service, and any, and all, associated add-on charges
- Description of the authorization and authentication procedures used when an end user authorization is obtained via a web site

BellSouth will review the information submitted in the service program request thoroughly and, if acceptable, resume billing. Only then will the service program charges be placed on an end user's telephone bill. While this review process will not eliminate all end user complaints of unauthorized charges (e.g., buyer's remorse, authorization from other household members), it allows BellSouth an opportunity to verify the legitimacy of the service program and also gives BellSouth an opportunity to provide feedback to the carrier on any service program materials that may result in end user confusion.

BellSouth would like to take this opportunity to affirm that, in accordance with FPSC Rules, when an end user notifies BellSouth that non-toll third-party charges are unauthorized, BellSouth (a) immediately removes the charges from the end user's bill; and (b) notifies the end user that the end user may elect to have these types of third party charges blocked on their BellSouth bill.

BellSouth takes its obligations to comply with the FPSC Rules regarding Cramming seriously and submits that it is in full compliance with all applicable rules and regulations. If you have any further questions or need any additional information, please do not hesitate to contact me.

Yours truly,

A handwritten signature in black ink that reads "Nancy H. Limmas". The signature is written in a cursive style with a horizontal line through the middle of the letters.

Direct - Regulatory Relations