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September 20, 2004

Ms. Beth Salak
Director, Division of Competitive Markets & Enforcement
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Dear Ms. Salak:

Pursuant to Florida Statute 364.05, we are filing herewith revision to our Access Service Tariff. Following is the page being filed:

Access Service Tariff

Section E2 - Ninth Revised
Page 10

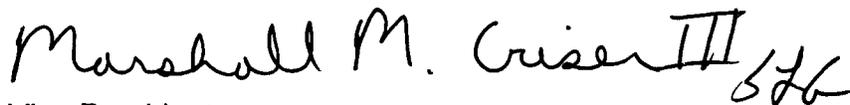
With this tariff filing, BellSouth Telecommunications, Inc., is lowering the percentage CPN floor from 19.22% to 7.00%.

This attachment constitutes a comprehensive package, which fulfills the basic requirements for supporting data specified in Rule 25-9.05.

Acknowledgment, date of receipt, and authority number of this filing are requested. A duplicate letter of transmittal is attached for this purpose.

Your consideration and approval will be appreciated.

Yours very truly,



Vice President
Regulatory Relations

Attachments

Executive Summary

Introduction

With this tariff filing, BellSouth Telecommunications, Inc., is lowering the percentage CPN floor from 19.22% to 7.00%. This reduction is necessary to more accurately reflect the percentage of traffic from interconnect carriers that does not contain CPN information for technical reasons. The current level of 19.22% is artificially high due to the inclusion of high percentages of optional removal of CPN by certain carriers. These high rates of missing CPN by certain carriers tends to artificially increase the current average and is not representative of the amount of CPN that cannot be delivered due to technical reasons. The new floor of 7.00% is the percentage of traffic, overall, that cannot pass CPN due to technical reasons.

Current Tariff

The current CPN “floor” percentage level is 19.22%. Traffic terminating to BellSouth from its interconnect carriers where the percentage of traffic without Calling Party Number (CPN) exceeds 19.22% of all traffic is assigned directly to the intrastate access category. The carrier is charged the appropriate terminating switched access charges in accordance with current charges in BellSouth’s Florida E6 access tariff. The current level of 19.22% represents the composite percentage of traffic from all carriers in BellSouth’s nine-state operating area that is missing the CPN data. This composite percentage includes instances where the carrier or its wholesale customer voluntarily strips or eliminates the CPN field, as well as certain instances where the CPN field is unavailable.

Proposed Tariff Changes

It is not possible for carriers to forward the CPN field in certain circumstances due to technical issues. For example, operator services calls are not SS7 compatible and a small number of carriers continue to use the “in-band signaling” method for call administration. It is not BellSouth’s intention to apply the provisions of the CPN tariff to instances where the carrier cannot receive, nor can forward, the necessary originating CPN information to permit BellSouth to apply the correct call jurisdiction for billing in accordance with filed tariffs. BellSouth has determined that it is not possible for carriers to send, on average, 7% of the CPN field for calls due to these technical limitations. It is therefore proposed to reduce the CPN floor percentage to 7%.

Customer Impact

BellSouth calculates that approximately 20 carriers in Florida will be affected by this change.

ISSUED: September 20, 2004

~~April 29, 2002~~

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

EFFECTIVE: October 20, 2004

~~May 29, 2002~~

E2. GENERAL REGULATIONS

E2.3 Obligations of the IC (Cont'd)

E2.3.14 Jurisdictional Report Requirements¹ (Cont'd)

A. Jurisdictional Reports (Cont'd)

1. Percent Interstate Usage (PIU) (Cont'd)

a. (Cont'd)

Where the Company receives insufficient call detail to identify the calling station to determine the jurisdiction, the Company will charge the applicable rates for terminating BellSouth SWA as set forth in this Tariff. There may be a percentage of usage where it is not possible to know, and therefore to send to BellSouth, the needed originating information. Accordingly, BellSouth will charge the terminating BellSouth SWA rate for only those minutes lacking originating information from all SWA customers, currently **7.00** ~~19.22~~ percent (%) (the "floor"). For example, if 30 percent (%) of a customer's minutes sent to BellSouth do not contain sufficient originating information to allow BellSouth to determine the originating location, then BellSouth would apply the provisions of this tariff to those minutes exceeding the "floor", or **23.00** ~~10.78~~ percent (%) in this example. (C)

BellSouth will recalculate the overall SWA customer average "floor" quarterly. In addition, subsequent reviews or audits of specific customer usage may result in a new "floor" for that customer.

In the event that BellSouth applies the intrastate terminating access rate to calls without sufficient originating information as provided in this tariff, BellSouth's access customers will have the opportunity to request backup documentation of BellSouth's basis for such application, and further request that BellSouth change the application of the intrastate access rate upon a showing of why the intrastate rate should not be applied.

For the purpose of this tariff, where the customer is a third-party provider of CCS7 services to its customers ("Third Party Customers"), the customer will develop its projected PIU factor based upon a weighted average of the PIUs of its Third Party Customers' end-user traffic in accordance with the procedures described below. A Third Party Customer may elect to have the Company determine the weighted PIU and in so doing the CCS7 provider shall name and identify their third party customers. In the event a Third Party Customer does not provide a projected PIU or does not elect to have the Company determine the PIU, a 50 percent PIU will be utilized for that Third Party Customer until such time as the Company obtains sufficient data to develop the PIU as specified in b. following.

The IC will provide in its initial order the projected Percent Interstate Usage (PIU) at a statewide level on a local exchange company specific basis. When the IC and/or End User computes the PIU, it will subtract the developed percentage from 100 and the difference is the percent intrastate usage. The sum of the interstate and intrastate percentage will equal 100 percent. A PIU of less than 100 percent is not allowed where the service is not available as an intrastate access service. The projected PIU may include up to two decimals.

The intrastate usage is to be developed as though every call that originates from a calling location within the same state as that in which the called station is situated is an intrastate communication and every call for which the originating location is in a state other than that where the called station is situated is an interstate communication. The manner in which the call is routed through the telecommunications network does not affect the jurisdiction of a call, i.e., a call between two points within the same state is an intrastate communication even if the call is routed through another state.

The Company will designate the number obtained by subtracting the intrastate percentage furnished by the IC from 100 (100 – customer percentage = interstate percentage) as the projected interstate percentage of use.

b. When an IC initially orders service(s), as defined in the following, the IC will state in its order the Percent Interstate Usage (PIU) separately for each, as set forth in a. preceding.

- BellSouth SWA FGA
- BellSouth SWA FGB
- BellSouth SWA FGD
- BellSouth SW 500 Service
- 700 Service
- BellSouth SWA 8XX Toll Free Dialing Ten Digit Screening Service
- BellSouth SWA 900 Service

Note 1: Except where indicated herein, references to BellSouth SWA FGs will also include the applicable BellSouth SWA Basic Serving Arrangement as detailed in the matrix in E6.1.3.A. of

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA

ACCESS SERVICES TARIFF

~~Eighth~~ **Ninth Revised Page 10**
Cancels Eighth Revised Page 10

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this Tariff (e.g., the term BellSouth SWA FGA represents both BellSouth SWA FGA and BellSouth SWA LSBSA).

E2. GENERAL REGULATIONS

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A. Jurisdictional Reports (Cont'd)

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