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Mar 11-30-00

Date: March 5, 1998

To: Allan Price
Bill Stacy

Copy to: Bill McNair
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Jim Childress
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Fred Hamff

From: Dave Hollett

Subject: North Carolina and Florida Orders Concerning ISP

We understand that the North Carolina commission issued an order related to ISP calls between BellSouth and US LEC, and the Florida commission issued a similar order for WorldCom. To my knowledge, CBS has not been notified formally of the NC ruling, though billing is impacted by the order. We did receive a copy of the FL ruling.

We need to know who will be responsible for coordinating implementation of these orders. We are currently facing serious resource constraints in the CABS billing area of IT, so any necessary billing changes will need to be submitted soon to even be a candidate for Release 98.3, currently scheduled for implementation in 4th quarter, 1998. We also have a pending request for bill format changes related to ISP. That work request is based on the assumption that ISP is not billable. If the ISP billing policy is likely to be changing because of the North Carolina and Florida orders, we should probably defer this current bill format request to allow other critical billing work to be done instead.

Attached are concerns and questions specific to the billing of ISP that we believe need to be addressed by someone in ICS and/or Regulatory.

Please let me know as soon as possible how you assess the impact of these rulings on billing for local interconnection. If you have questions, please call me at 205-321-3736.

**BELLSOUTH MEMO OF MARCH 5, 1998
FROM DAVE HOLLETT TO ALLAN PRICE
AND BILL STACY**

Cont. # 2

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET
NO. 991267-TP EXHIBIT NO. 8
COMPANY/
WITNESS: Global NAPS
DATE: 1-25-2000

DOCUMENT NUMBER-DATE

01139 JAN 26 8

FPSC-RECORDS/REPORTING

ISP Issues to be Addressed

1. Do the rulings apply to all CLECs or only to US LEC in North Carolina and WorldCom in Florida?
2. We quit billing for calls terminated to an ISP, but we held that usage. Should that held usage be billed? If so, would billing guarantee apply, and should the usage be billed or should a debit adjustment be made to the bill?
3. Does the pending billing change request submitted by the local interconnection project team need to be suspended? This request, to detail the non-billed ISP usage on the bill, is currently targeted for CABS Release 98.2, which has serious resource jeopardies.
4. Does a new request to begin billing ISP usage in North Carolina and Florida need to be submitted? If so, what is the priority in light of the resource contention in CABS?
5. Will BellSouth change the policy regarding billing for ISP on a state by state basis, or is it likely we will change the policy for all states at the same time?