

ORIGINAL

NANCY B. WHITE
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BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5558

October 23, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 970644-TP and 970744-TP (Fed. Lifeline Asst. Plan)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Waiver of the Toll Limitation Requirements, which we ask that you file in the above-captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

- ACK
- AFA _____
- APP _____
- CAF _____
- EMU Maush
- CTR _____
- EAG _____
- LEG 1 NBW/vf
- LIN 5 cc: All parties of record
- OPC _____
- ROB _____
- SLJ 1
- WFS _____
- OPR _____

Sincerely,

Nancy B. White (KR)

Nancy B. White

RECEIVED & FILED
[Signature]
FPC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10967 OCT 23 5

FPC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of eligible) Docket No.: 970644-TP
telecommunications carriers pursuant)
to Section 214(e) of the)
Telecommunications Act of 1996)

In re: Implementation of changes in) Docket No. 970744-TP
the Federal Lifeline Assistance Plan)
currently provided by)
telecommunications carriers of last)
resort)

Filed: October 23, 1997

**PETITION FOR WAIVER OF THE
TOLL LIMITATION REQUIREMENTS**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to the provisions of Rule 25-22.036(4)(a), Florida Administrative Code, hereby files this Petition requesting the waiver of the requirement contained in Order No. PSC-97-1262-FOF-TP for BellSouth to provide toll limitation service. In support thereof, BellSouth states the following:

1. BellSouth is a telephone company lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.

2. BellSouth's principal place of business in Florida is 150 W. Flagler Street, Suite 1910, Miami, Florida 33130. Pleadings and process in this matter may be served upon:

Robert G. Beatty
Nancy B. White
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, Florida 32301

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

3. BellSouth is subject to the regulation of the Florida Public Service Commission (the "Commission"). The substantial interests of BellSouth will be affected by the Commission's determination as to the matters set forth in this petition.

4. On October 14, 1997, this Commission issued Order No. PSC-97-1262-FOF-TP ("Order"). The Order required local exchange companies to offer toll limitation services to Lifeline subscribers pursuant to FCC Order No. 97-157, released May 8, 1997 ("FCC Order"). The Order further held that states could grant waivers to carriers technically incapable of providing toll limitation services. The Commission ordered local exchange companies unable to provide toll limitation services at this time to file implementation plans and a request for waiver by October 23, 1997.

5. Toll limitation services allow subscribers to specify a monetary amount of toll usage that the subscribers will allow to be incurred on their telephone per month. At the present time, BellSouth cannot provide toll limitation; BellSouth provides toll blocking. Toll blocking services allow subscribers to prohibit the completion of outbound toll calls from their telephone.

6. Toll limitation services require the ability, on the part of the local exchange company, to monitor the toll charges of each subscriber. In order to accomplish this, the local exchange company must receive recording and rating information on an hourly basis from every interexchange carrier used by the subscriber during each billing cycle, including those interexchange carriers for whom BellSouth does not bill. Without this

information, the local exchange company has no way of knowing the amount of toll usage that has been incurred by the subscriber during the billing cycle.

7. BellSouth is unable to even begin the process of developing an implementation plan for toll limitation service until it can be assured that such recording and rating information will be forthcoming from the interexchange companies on an intrastate and interstate basis. Therefore, BellSouth seeks permission to delay the development of a toll limitation implementation plan, as well as the actual implementation of toll limitation service until such time as the issue of the information required is resolved.

WHEREFORE, BellSouth requests on an expedited basis the entry of an order authorizing the waiver of the toll limitation requirement.

Respectfully submitted this 23rd day of October, 1997.

Robert G. Beatty (kr)
ROBERT G. BEATTY
NANCY B. WHITE
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(305) 347-5555

William J. Ellenberg II (kr)
WILLIAM J. ELLENBERG II
J. PHILLIP CARVER
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Atlanta, GA 30375
(404) 335-0711

CERTIFICATE OF SERVICE
Docket Nos. 970644-TP and 970744-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by Hand Delivery this 23rd day of October, 1997 to the following:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White (v.p.)
Nancy B. White