

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
BellSouth Plan for)
Comparably Efficient Interconnection)
for Voice Messaging Services)
)

MINOR CEI PLAN AMENDMENT

BellSouth Corporation, on behalf of BellSouth Telecommunications, Inc. (“BellSouth”), hereby publishes this Amendment to BellSouth’s previously approved plan for comparably efficient interconnection (“CEI”) for voice messaging services.¹ By this Amendment, BellSouth notifies the public of BellSouth’s intent to tariff a new complementary network service (“CNS”) and to offer that CNS to customers of voice messaging service providers, including BellSouth’s own voice messaging services.² As set forth herein, the new CNS will be provided in conformance with all of the Commission’s CEI requirements.

The New Service Feature

The new feature that BellSouth plans to provide will offer a subscriber to any voice messaging provider’s service the ability to quickly reach his or her voice mailbox by using a

¹ See, *BellSouth Plan for Comparably Efficient Interconnection for Voice Messaging Services*, 3 FCC Rcd 7284 (1988) (subsequent history omitted).

² The Commission has eliminated its requirement that CEI plans and amendments be filed with and approved by the Commission before (“BOC”) offers services in accordance with such plans or amendments. *Computer III further reviewed Proceedings: Bell Operating Company Provision of Enhanced Services; 1998 Biennial Regulatory Review – Review of Computer III and ONA Safeguards and Requirements*, CC Docket No. 95-20, 98-10, Report and Order, FCC 99-36 (released March 10, 1999).

common vertical service code. Specifically, a voice messaging subscriber may activate this feature from the line with which the voice messaging service is associated simply by picking up the telephone handset and dialing “*98”. On activation of this feature, a call path will be established between the subscriber and the subscriber’s voice messaging platform (or telephone answering service provider), where the subscriber will be able to retrieve messages and perform other message management tasks. This feature activation method allows individual subscribers to access their respective voice messaging providers from the line with which their voice messaging service is associated.³

The new access feature operates by connecting the customer to the local telephone number of the customer’s voice messaging provider as indicated in the customer’s Call Forwarding Don’t Answer subscription (*i.e.*, the “forward-to” number). Because of the dependence of the new feature on the presence of a “forward-to” number, an appropriate Call Forwarding Don’t Answer subscription will be required.⁴

Tariff Filings

BellSouth’s new feature will be associated with end users’ lines rather than with voice messaging providers’ access arrangements and is therefore appropriately classified as a CNS.⁵

³ Customers will still be able to reach their voice messaging providers by dialing appropriate seven- or ten-digit numbers and, in fact, will be required to do so when calling from any line other than the one to which their voice messaging service is assigned.

⁴ This new feature appears to be functionally similar to that previously added to Ameritech’s voice messaging CEI plan. *See*, Minor Amendment to Ameritech’s Plan to Provide Comparably Efficient Interconnection to Providers of Voice Mail Messaging Service (filed March 10, 1998).

⁵ *See, Filing and Review of Open Networks Architecture Plans*, 4 FCC 1, 47-49 (1988) (“*BOC ONA Order*”).

Further, because the feature is a CNS, it is appropriately tariffed in the state jurisdiction, and federal tariffing is not required.⁶

BellSouth plans to tariff this new feature for general availability in all of its states. The service initially will be offered to residential subscribers in Savannah, Georgia, in September 1999, with expansion to business and residential customers throughout Georgia planned for November. BellSouth also plans to offer the new feature in all its remaining states in December, except for North Carolina and South Carolina where the service is slated to be introduced in the second quarter of 2000. Current tariff availability of the feature can be determined by visiting BellSouth's online tariff website at <http://cpr.bst.bellsouth.com/index2.html>.

Compliance with CEI and Other Safeguards

Customers of BellSouth's voice messaging operations will purchase the new CNS from the same tariffs, at the same rates, and under the same conditions that are available to customers of any other voice messaging provider. In particular, all subscribers to this CNS will dial the identical *98 code to activate this feature, irrespective of the customer's voice messaging provider. Accordingly, BellSouth's offering meets each of the Commission's CEI parameters.

Interface Functionality. This parameter requires a carrier to "make available standardized hardware and software interfaces that are able to support transmission, switching, and signaling functions identical to those utilized in the enhanced service provided by the carrier"⁷ and to make available "[i]nformation and technical specifications for such interfaces ... according to the

⁶ *Id.* at n.161.

⁷ *Amendment of Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry)*, 104 FCC 2d 958, 1039 (1986) ("*Computer III Order*").

[Commission's] network disclosure requirements.”⁸ Since this new basic service is a CNS, it has no impact on any service interface. Accordingly, this parameter is not applicable.

Unbundling of Basic Services. This parameter requires carriers to unbundle and associate with a specific rate element in the carrier's tariff the basic services and basic service functions that underlie the carrier's enhanced service offering.⁹ As indicated above, the new basic feature is unbundled and associated with a specific rate element. As noted, of course, the new feature will require the end user to subscribe to an appropriate Call Forwarding Don't Answer feature in order for the new feature to work.

Resale. This parameter requires a carrier's enhanced service operations to take the basic services used in its enhanced service offerings at their unbundled tariffed rates.¹⁰ Because this new feature is a CNS, it is not “used in” BellSouth's voice messaging offerings, and this parameter is not applicable. If BellSouth's voice messaging operating procures the new feature on behalf of its customers, however, it will do so at the same unbundled tariffed rates and on the same terms under which any other voice messaging provider could procure the feature for its customers.

Technical Characteristics. This parameter requires carriers to provide basic services with technical characteristics that are equal to those of the basic services utilized by a carrier's own enhanced services.¹¹ Because this feature is a CNS, it is not utilized by BellSouth's voice messaging operation, and this parameter is not applicable. However, the technical characteristics

⁸ *Id.*

⁹ *Id.* at 1040.

¹⁰ *Id.*

¹¹ *Id.* at 1041.

of the feature will be identical irrespective of the subscriber's choice of voice messaging provider.

Installation, Maintenance, and Repair. This parameter requires that the time periods for installation, maintenance, and repair of the new feature be the same as those the carrier provides to its own enhanced service operations.¹² Because this feature is provided to end users rather than to voice messaging providers, this parameter is not directly applicable. Nevertheless, the new feature, as a CNS provided to end users, will be provisioned in accordance with BellSouth's existing standardized ordering and provisioning processes. The Commission has previously concluded that such standardized ordering and provisioning processes provide assurance that a carrier will not be able to discriminate against end users who purchase CNSs for use with competing enhanced services.¹³ Accordingly, this parameter is satisfied.

End User Access. This parameter requires a carrier to provide all end users the same abbreviated dialing and signaling capabilities that are needed to activate or obtain access to enhanced services that use the carrier's facilities.¹⁴ This parameter is met because all end users will utilize the identical *98 dialing sequence to activate call origination to their respective voice messaging platforms.

CEI Availability. This parameter requires a carrier to make its basic service offering available and fully operational on the date that it offers its corresponding enhanced service to the public. BellSouth's voice messaging service is already available to the public, so this parameter is not directly applicable. Nevertheless, BellSouth's new basic service feature will not be

¹² *Id.*

¹³ *BOC ONA Order*, 4 FCC Rcd. at 26-27.

¹⁴ *Computer III Order*, 104 FCC 2d at 1041.

available to end users of BellSouth's voice messaging service until the feature is also available on the same terms and conditions to customers of other voice messaging providers.

Additionally, a carrier is required to provide a reasonable opportunity for prospective users of a new basic service to test it with their enhanced service offerings. BellSouth's new basic service feature operates solely on an end user's line and has absolutely no interaction with any aspect of BellSouth's or any other voice messaging service provider's offering. Nevertheless, BellSouth will provide interested voice messaging providers with reasonable opportunities to observe or otherwise test the new functionality with their voice messaging offerings. Accordingly, this parameter is met.

Minimization of Transport Costs. This parameter requires carriers to provide nonaffiliated ESPs with interconnection facilities that minimize transport costs.¹⁵ Because the new feature is a CNS and does not affect any ESP's interconnection facilities or costs, this parameter is not applicable.

Recipients of CEI. This parameter prohibits a carrier from restricting the availability of the CEI offering to any particular class of customer or enhanced service competitor. BellSouth's new basic service feature will be available to all subscribers who utilize compatible basic local exchange services, including an appropriate Call Forwarding Don't Answer feature, in accordance with the tariffing schedule outlined above. Although the new feature is expected to have greatest utility in voice messaging applications, the feature will not be limited to customers of voice messaging providers.

¹⁵ *Id.* at 1042.

Other Safeguards. Nothing in the introduction of this new basic service feature will interfere with or otherwise affect BellSouth's continued compliance with the Commission's other nonstructural safeguards, including accounting, CPNI and network disclosure obligations.