

**BELLSOUTH TELECOMMUNICATIONS, INC.**  
**COMPARABLY EFFICIENT INTERCONNECTION PLAN FOR**  
**ENHANCED DIRECTORY ASSISTANCE SERVICE**

**I. INTRODUCTION**

BellSouth Telecommunications, Inc. (“BellSouth”), hereby posts this Comparably Efficient Interconnection Plan for Enhanced Directory Assistance (“EDA”) service pursuant to the Commission’s *CEI Plan Order*.<sup>1</sup> In that *Order*, the Commission eliminated the requirement that Bell Operating Companies (“BOCs”) file and obtain pre-approval of CEI plans prior to offering enhanced services. Instead, the Commission now permits BOCs to provide enhanced services upon the posting of a CEI plan on the BOC’s publicly accessible website.

This plan describes the underlying basic network service that may be used by BellSouth’s EDA Service and will be provided to other Enhanced/Information Service Providers (“ESPs/ISPs”) in accordance with the Commission’s nine CEI parameters.<sup>2</sup>

**II. SERVICE DESCRIPTION**

The Commission requires all CEI plans to contain a short general description of the enhanced service activity covered by the plan. This section satisfies that requirement.

The EDA service and related access feature covered by this plan present a robust set of capabilities that provide wholesale customers the ability to provide their end users with timely and useful information that goes well beyond traditional Directory Assistance (“DA”) service.

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<sup>1</sup> *Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services, 1998 Biennial Review – Review of Computer II and ONA Safeguards and Requirements*, CC Docket Nos. 95-20, 98-10, *Report and Order*, 14 FCC Rcd 4289 (1999) (“*CEI Plan Order*”).

<sup>2</sup> *See Amendment of Section 64.702 of the Commission’s Rules and Regulations (Third Computer Inquiry)*, 104 F.C.C.2d 958 (1986) (“*Phase I Order*”), *recon.*, 2 FCC Rcd 3035 (1987) (“*Phase I Recon. Order*”) (subsequent history omitted).

BellSouth's EDA service will enable carriers and other wholesale customers to offer movie listings, stock quotes, driving directions, restaurant reviews, weather reports, sports scores, traffic reports, and other information to their respective wireline or wireless subscribers.<sup>3</sup> BellSouth will not offer this service as a retail product to its local exchange customers or the general public.

To obtain wholesale EDA service from BellSouth, the customer must arrange for the necessary trunking and transport of its subscribers' calls to specified BellSouth-maintained operator switches. Once the wholesale customer delivers its calls to the specified BellSouth switch, the calls will be queued and distributed to operator terminals where call attendants will respond to callers' verbal requests.

BellSouth's call attendants will offer and provide, upon request, a variety of information to the end users of the wholesale customer's service. The actual information provided is dependent on the service to which BellSouth's wholesale customer subscribes. The information provided will cover locations throughout the country.

BellSouth's call attendants will retrieve the pertinent information from BellSouth information storage facilities that house data content obtained or licensed by BellSouth from third parties. Requested information may be provided by the call attendant or by audio recording.

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<sup>3</sup> This list of information categories represents neither an exhaustive nor exclusive itemization of features that might be offered. Rather, BellSouth anticipates that the scope of its EDA services will continue to evolve as technology and market conditions develop.

### **III. COMPARABLY EFFICIENT INTERCONNECTION**

This section of the Plan demonstrates BellSouth's compliance with the nine CEI parameters established in the *Phase I Order*.<sup>4</sup>

#### **A. Interface Functionality**

The Commission requires BOCs to make available to competing ESPs/ISPs 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. Information and technical specifications for such interfaces must be available in accordance with the Commission's network disclosure rules.<sup>5</sup>

All entities, including BellSouth's enhanced service provider, may access BellSouth's network through existing standard network interfaces for which information and technical specifications have been made available in accordance with the Commission's network disclosure requirements. If any new basic services are made available to BellSouth's EDA service, they will be made available to other ESPs/ISPs at the same time, in the same jurisdictions, on the same terms and conditions, and in accordance with the network disclosure rules.

#### **B. Unbundling of Basic Services**

As part of its CEI offering, the basic services and the basic service functions that underlie a BOC's enhanced service offering must be unbundled from other basic service offerings and associated with a specific rate element in the BOC's tariffs.<sup>6</sup>

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<sup>4</sup> *Phase I Recon. Order*, 104 F.C.C.2d at 1039-43.

<sup>5</sup> 47 C.F.R. §§ 51.325-51.335.

<sup>6</sup> *Phase I Recon. Order*, 104 F.C.C.2d at 1040.

The basic access service that will be used by BellSouth's EDA service has been unbundled from other service offerings and is available through BellSouth's tariffs. The following is a list of tariffed services that may be utilized by any other ESP/ISP or its customers in the same manner as BellSouth uses them in the provisioning of its EDA service.<sup>7</sup>

<u>Service</u>	<u>Tariff References</u>
BellSouth Operator Services Automatic Call Distribution (OS-ACD) Service	Access Service, FCC No. 1, Section A9.7 (Illustrative)  Access Services – States Tariffs TBD

BellSouth may amend this plan from time to time to add additional basic services to this list in accordance with the *CEI Plan Order*.

### **C. Resale**

This parameter requires the carrier's enhanced service operation to take the basic services used in its enhanced service offerings at their unbundled tariff rates.<sup>8</sup>

BellSouth meets this requirement because its EDA operations will take all underlying basic services from the same tariffs and subject to the same terms and conditions available to other ESPs/ISPs. As noted in the *Phase I Order*, this parameter is satisfied through appropriate accounting techniques.<sup>9</sup>

### **D. Technical Characteristics**

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<sup>7</sup> Current tariffs for these services may be found on BellSouth's tariff web page at <http://cpr.bst.bellsouth.com/index2.html>.

<sup>8</sup> *Phase I Recon. Order*, 104 F.C.C. 2d at 1040.

<sup>9</sup> *Id.*, n.218.

Pursuant to this parameter, the technical characteristics of the basic services provided by BellSouth and other ESPs/ISPs must be equal to those used by BellSouth's own EDA service.<sup>10</sup>

As noted above, BellSouth will order the basic services utilized in its EDA services from the same tariffs as other ESPs/ISPs. BellSouth's previously approved nondiscriminatory circuit assignment and installation procedures will ensure that there can be no systematic discrimination in circuit assignment based on identity of the customer or the intended use. Additionally, BellSouth files annual affidavits attesting that its procedures have been followed and, consequently, that no discrimination has occurred. Accordingly, this parameter is satisfied.

#### **E. Installation, Maintenance and Repair**

The Commission further requires the time periods for installation, maintenance, and repair of the basic services underlying the carrier's enhanced service to be the same as those the carrier provides to competing ESPs/ISPs.<sup>11</sup>

BellSouth's internal procedures for installing, maintaining and repairing all of its basic services are sufficiently uniform that the discrimination against any customers or type of customer in the performance of these functions is prevented. BellSouth detailed these procedures in its original ONA Plan (CC Docket No. 88-2) and the Commission approved them in the *BOC ONA Order*.<sup>12</sup> This parameter is therefore satisfied.

#### **F. End User Access**

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<sup>10</sup> *Id.* at 1041.

<sup>11</sup> *Id.*

<sup>12</sup> *Filing and Review of Open Network Architecture Plans*, CC Docket No. 88-2 Phase I, *Memorandum Opinion and Order*, 4 FCC Rcd 1, ¶¶ 467-73 (1988) ("*BOC ONA Order*").

Pursuant to this parameter, if a carrier offers end users the ability to use abbreviated dialing or signaling to activate or access the carrier's enhanced services, the carrier must provide the same capabilities to end users of competing ESPs/ISPs. Similarly, end users must have equal opportunities to access basic facilities through derived channels whether they use the enhanced services of the carrier or of a competitor.<sup>13</sup>

BellSouth will not be providing access to its EDA service to its own end users. End users of those wholesale carriers who have contracted with BellSouth to provide EDA services will be served in the same manner as end users of competing ESPs/ISPs. Competing ESPs/ISPs (and subsequently their end users) will have access via the same tariffed services. Thus, this parameter is also satisfied.

#### **G. CEI Availability**

With this parameter, the Commission requires carriers to make the basic services underlying their enhanced service offerings available to competing ESPs/ISPs in the same location and on the same dates for other ESPs/ISPs as for themselves. BOCs also must provide other ESPs/ISPs reasonable testing opportunities for new basic services used by the BOC's enhanced service.<sup>14</sup>

Because BellSouth's EDA service will obtain underlying basic services pursuant to the same tariffs as other ESPs/ISPs, BellSouth will have access to those underlying services only at the same time and in the same locations as those underlying services are available to other ESPs/ISPs. Further, consistent with the *CEI Plan Order*, if BellSouth introduces a new basic service that is to be used by BellSouth's EDA service, BellSouth will make testing capability for

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<sup>13</sup> *Phase I Recon. Order*, 104 F.C.C. 2d at 1041.

<sup>14</sup> *Id.*

the new service available to competing ESPs/ISPs no later than simultaneously with BellSouth's posting an amendment to this plan and initiating use of the new service.<sup>15</sup> Accordingly, the conditions of this parameter are met.

#### **H. Minimization of Transport Costs**

This parameter requires carriers to work to minimize the difference in transmission costs incurred by a BOC's collocated enhanced service to a competitor's non-collocated enhanced service.<sup>16</sup> In the *BOC ONA Order*, the Commission established that this parameter can be met if the BOC charges its own collocated enhanced service an access link rate that is the same as that paid by a non-collocating ESP/ISP. For distance sensitive transmission rates, however, the BOC must charge its own collocated enhanced service no less than it would charge an ESP/ISP located two miles from that central office.<sup>17</sup> BellSouth will comply with this parameter by charging its EDA enhanced service operation for access links as if such equipment were located two miles from that serving office. This parameter is thereby satisfied.

#### **I. Availability to All Interested ESPs/ISPs**

The final CEI parameter requires carriers not to restrict the availability of CEI to any particular class of customer or enhanced service competitor.<sup>18</sup>

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<sup>15</sup> *CEI Plan Order*, 14 FCC Rcd at 4302-03, ¶ 20.

<sup>16</sup> *Phase I Recon. Order*, 104 F.C.C.2d at 1042.

<sup>17</sup> *BOC ONA Order*, 4 FCC Rcd at 78, 86-87.

<sup>18</sup> *Phase I Recon. Order*, 104 F.C.C.2d at 1042.

This parameter ensures that all ESPs/ISPs have the same opportunity to avail themselves of the underlying basic services, and, further, that a BOC does not engage in anticompetitive teaming with one competitive ESP/ISP and against others.<sup>19</sup>

BellSouth affirms that the underlying basic services used with BellSouth's EDA service will not be limited to any class of customer or enhanced service competitor. All such services are available on a tariffed basis and accessible by all users for any lawful purpose. If any new arrangements are to be made available for BellSouth's enhanced service provider, they will be made available to all other ESPs/ISPs at the same time, in the same jurisdiction, and on the same terms and conditions. Accordingly, this parameter is also satisfied.

#### **IV. OTHER NON-STRUCTURAL SAFEGUARDS**

##### **A. Allocation of Joint and Common Costs**

The nonstructural safeguards adopted in the *Computer III* proceeding include the Commission's Part 64 rules for the allocation of costs between regulated and non-regulated activities. These rules were first developed in the *Joint Cost* proceeding<sup>20</sup> and later strengthened in the *Computer III Remand* proceeding.<sup>21</sup> BellSouth will comply with these rules and with BellSouth's Cost Allocation Manual as it may be amended from time to time and approved by the Commission.

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<sup>19</sup> *CEI Plan Order*, 14 FCC Rcd at 4299, ¶ 13.

<sup>20</sup> *Separation of Costs of Regulated Telephone Service from Costs of Nonregulated Activities, Report and Order*, 2 FCC Rcd 1298 (1987), *modified on recon.*, 2 FCC Rcd 6283 (1987).

<sup>21</sup> *Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier I Local Exchange Company Safeguards*, 6 FCC Rcd 7571 (1991), *vacated in part and remanded, California v. FCC*, 39 F.3d 919 (9th Cir. 1994).

**B. Nondiscrimination Reporting**

BellSouth will continue to abide by the Commission's existing nondiscrimination reporting rules, which require BOCs to file quarterly installation and maintenance and nondiscrimination reports. Basic services associated with BellSouth's EDA service will be aggregated with other BellSouth services offered pursuant to CEI plans, and a single report will be filed for all such services.

**C. Disclosure of Network Information**

BellSouth confirms that interconnection between basic services used by BellSouth's own EDA service or by those of another provider will be achieved through published network interfaces. If BellSouth changes any existing network interface specifications or uses new interface specifications for basic underlying services, it will comply with the Commission's network disclosure rules.<sup>22</sup>

**D. Customer Proprietary Network Information**

BellSouth will comply with Section 222 of the Communications Act of 1934 and the Commission's rules implementing Section 222 of the Act.<sup>23</sup>

**V. CONCLUSION**

BellSouth's CEI Plan for EDA service is in compliance with the Commission's CEI requirements and is hereby posted on BellSouth's publicly accessible website.

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<sup>22</sup> See 47 C.F.R. §§ 51.325-51.335.

<sup>23</sup> *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, et al.*, CC Docket No. 96-115, *et al.*, *Third Report and Order and Third Further Notice of Proposed Rulemaking*, FCC 02-214 (rel. July 25, 2002).