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T.R.A. DOCKET ROOM
September 20, 2004

VIA HAND DELIVERY

Mr. Aster Adams
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration Under
the Telecommunications Act of 1996*
Consolidated Docket No. 03-00585

Dear Mr. Adams

Enclosed is BellSouth's response to your data request of August 30, 2004.
Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH.ch

REQUEST: Do BellSouth Tennessee tandems currently send the necessary information either in the SS7 data stream or in the call record, to small rural independents subtending those tandems, which can be used to facilitate the independent's ability to identify and bill back the company originating the traffic? If so, please describe in detail what specific data is contained in this information

RESPONSE: Yes. BellSouth provides ICOs EMI 11-01-01 records, which are recorded in the BellSouth tandem. The format and content of these records are defined by the Alliance for Telecommunications Industry Solutions ("ATIS"), an industry standards body. Among other activities, ATIS manages standardization activities for wireless and wireline networks, including interconnection standards, number portability, toll-free access, telecom fraud, and order and billing issues. ATIS is accredited by the American National Standards Institute ("ANSI").

Exhibit No. 1 shows the format and data content of an EMI 11-01-01 record. This format came from the ATIS July 2004 update of the Exchange Message Interface Guidelines, Issue 21, Revision 2, page 3-297. Exhibit No. 2 shows actual 11-01-01 records for calls from customers of three ICOs to Cingular, and calls from Cingular customers to customers of three ICOs. A column on page 4 of this Exhibit has been shaded to show the originating operating company identification (orig ocn).

In addition to the EMI 11-01-01 information provided to the ICOs, BellSouth provides Signaling System 7 ("SS7") signaling to ICOs. BellSouth follows industry standards for SS7, and its signaling and other traffic information contain all of the industry standard information to the extent such information is provided in the call stream from the originating carrier. Such signaling and traffic information, which is provided in real time for call set-up purposes, is not typically used by companies for the purpose of generating billing. Nonetheless, such information could be used by the ICO for comparison with the EMI 11-01-01 records that it receives from BellSouth. BellSouth does not use such signaling data in this fashion and believes the process may be time consuming. However, it is correct that such information could be useful in comparison and verification of the accuracy of the EMI 11-01-01 records.

REQUEST: How is this information sent:

- a. In the call detail over the feature group C trunks; or
- b. Through the SS7 signaling?

RESPONSE: The EMI 11-01-01 records are not sent via "feature group C trunks", or through the SS7 signaling. Rather, EMI 11-01-01 records are sent by BellSouth to the ICOs electronically, either on a weekly or daily schedule. These records are not part of the "real time" signaling accompanying the call.

The SS7 signaling data is part of the real-time call set-up process. As discussed in the response to Item No. 1, SS7 data is not typically used for the purpose of generating billing. While SS7 data could be useful for verifying the accuracy of the EMI 11-01-01 records, SS7 data may not supply all of the information needed for accurate billing.

With regard to Feature Group C trunks, this question presumes that the connection between BellSouth and the ICOs can be accurately described as a "feature group C trunk". BellSouth disagrees with this description because Feature Group C trunks are technically defined to work with non-equal access end offices, which is not the case here. Rather, the important point is that the interconnection trunks currently connecting BellSouth's tandems with ICO switches are the same type of trunks that connect BellSouth's network to CLECs and to CMRS providers. Further, billing information for calls routed over these interconnection trunks is provided in the EMI 11-01-01 record. BellSouth is unaware of any trunk group type with signaling that provides the same billing information as the industry standard EMI 11-01-01 record.

REQUEST: Is it necessary for BellSouth to upgrade its tandem trunking, used to pass traffic to Tennessee small rural independents subtending those tandems, to feature group D or to upgrade its switch software in order to send a record type to the independent that contains the originating carrier ID in the terminating record?

RESPONSE: No. As discussed in the response to Item 2, billing information is provided in the EMI 11-01-01 record as defined by ATIS, the industry standards group. Further, BellSouth is unaware of any trunk group type or switch upgrade feature that can provide the same information as contained in the standard EMI 11-01-01 record.

EMI 11-01-01 RECORD																		
		record id	date	from num length	from number	overflow	to num length	to number	orig term ind	trunk group num	reserved	cic code	cxr access method	routing	dialing	ani		
Originating Company	Terminating Company																	
		Peoples Tel Co	Cingular Wireless	110101	040908	10	9312890000	000	10	9319805009	2	0534	0	0000	5	1	8	2
		West Tenn Tel Co	Cingular Wireless	110101	040909	10	7317420000	000	10	7312175351	2	1377	0	0000	0	1	8	3
		Crockett	Cingular Wireless	110101	040909	10	7316960000	000	10	7312177199	2	1158	0	0000	0	1	8	3
		Cingular Wireless	Peoples Tel Co	110101	040907	10	9015528950	000	10	7316562003	2	0456	0	0000	0	1	0	0
Cingular Wireless	West Tenn Tel Co	110101	040907	10	9015528950	000	10	7312432121	2	0456	0	0000	0	1	0	0		
Cingular Wireless	Crockett	110101	040907	10	9015179998	000	10	7316624108	2	0591	0	0000	0	1	0	0		

		EMI 1101-01 RECORD																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Originating Company	Terminating Company	ncta		connect time		billable min		billable sec and tenths		method of record		return code		from rao		local co info		type of acc		reserved 1		signaling		ind 1		ind 2		ind 3		ind 4		ind 5		ind 6		ind 7		ind 8		ind 9		ind 10		ind 11		ind 12																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			

		1-01 RECORD										EMI 11-0			
Originating Company	Terminating Company	figa num	reserved2	neca co code	call event status	reserved3	fig	library code	settlement code	conversation time	orig ln	orig ocn	org ln source ind	term ln	
Peoples Tel Co	Cingular Wireless	0000000000	00000	0000	00	00	D	G3	Z	0000000	0000000000	0576	0	6157209950	
West Tenn Tel Co	Cingular Wireless	0000000000	00000	0000	00	00	D	G3	Z	0000000	0000000000	0583	0	0000000000	
Crockett	Cingular Wireless	0000000000	00000	0000	00	00	D	G3	Z	0000000	0000000000	0561	0	0000000000	
Cingular Wireless	Peoples Tel Co	0000000000	00000	0000	00	00	D	G3	Z	0000000	0000000000	6219	9	0000000000	
Cingular Wireless	West Tenn Tel Co	0000000000	00000	0000	00	00	D	G3	Z	0000000	0000000000	6219	9	0000000000	
Cingular Wireless	Crockett	0000000000	00000	0000	00	00	D	G3	Z	0000000	0000000000	6219	9	0000000000	

		01-01 RECORD			
Originating Company	Terminating Company	term ocn	term ltn source ind	send to ocn	reserved fill
Peoples Tel Co	Cingular Wireless	0000 1	6219	000000000000000000000000	
West Tenn Tel Co	Cingular Wireless	0000 0	6219	000000000000000000000000	
Crockett	Cingular Wireless	0000 0	6219	000000000000000000000000	
Cingular Wireless	Peoples Tel Co	0000 9	0561	000000000000000000000000	
Cingular Wireless	West Tenn Tel Co	0000 9	0576	000000000000000000000000	
Cingular Wireless	Crockett	0000 9	0583	000000000000000000000000	

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

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