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January 4, 2001

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
360 James Robertson Parkway  
Nashville, TN 37201

Re: Tariff Filings by all Telephone Companies Regarding Reclassification of  
Pay Telephone Service as Required by FCC Order 96-439  
Docket No. 97-00409

Dear David:

The Tennessee Payphone Owners Association ("TPOA") has reviewed the revised payphone tariffs which were filed by BellSouth Telecommunications, Inc. ("BellSouth") on December 29, 2000 as directed by the Authority.

TPOA believes that the filing does not fully comply with the TRA's instructions. Section A7.4.5 A2 (Ninth Revised Page 9) of the tariff include the same charges of \$2.00 to \$4.00 per month for central office blocking and screening that are found in BellSouth's existing tariffs.

The TRA has found that BellSouth's rate for non-traffic sensitive charges should be \$13.78 per month. That rate presumably includes BellSouth's costs for blocking and screening which, according to BellSouth's cost study and the TRA's adjustments, should be about \$.20 a month. See Supplemental Rebuttal of TPOA witness Don Wood. Clearly the \$2.00 to \$4.00 charges in BellSouth's tariffs are not consistent with the FCC's guidelines or the TRA's recent ruling.


Therefore, the TPOA asks that the TRA not approve BellSouth's revised tariffs without further investigation of the company's charges for blocking and screening. If, as TPOA

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believes, those charges are included in the TRA's \$13.78 rate, TPOA asks that the Authority remove those blocking and screening charges from BellSouth's revised tariffs.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Henry Walker

HW/nl  
Enclosure  
c: All parties