BELLSOUTH

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EXECUTIVE SECRETARY

November 29, 1999

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: *Consumer Advocate Division vs. BellSouth Telecommunications, Inc.*
Docket No. 99-00574

Dear Mr. Waddell:

As required by the Filing Notice issued on November 19, 1999, BellSouth Telecommunications, Inc. respectfully submits the enclosed Issues Matrix. In an attempt to develop a joint issues matrix, BellSouth faxed a draft copy of this document to the Consumer Advocate Division ("CAD") on November 23, 1999 and asked the CAD to provide its position statement for each issue to BellSouth. As of 11:00 a.m. today, however, the CAD has not provided BellSouth with any position statement or with any substantive comments regarding its purported issues in this docket.

Very truly yours,

Patrick Turner

Patrick W. Turner

PWT/jem

Enclosure

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BELLSOUTH ISSUES MATRIX
CONSUMER ADVOCATE DIVISION vs. BELLSOUTH TELECOMMUNICATIONS, INC.
TRA DOCKET NO. 99-00574

ISSUE	CAD POSITION	BELLSOUTH POSITION
Issue 1: Is BellSouth's proposed late payment charge a rate for a telecommunications service?		No. The proposed Late Payment is not a rate for any telecommunications service and will not result in an increase in any local exchange telephone service rates. Customers will be billed the same rates for telecommunications services after the implementation of a Late Payment Charge as they were billed for those services before the implementation of the Late Payment Charge, and if they pay their bills on time, they will never be affected by the Late Payment Charge. The Late Payment Charge will only affect customers who order services, receive the benefit of those services, and cause BellSouth to incur additional costs by failing to pay for those services on a timely basis.
Issue 2: Does BellSouth's proposed late payment charge constitute an increase in basic local exchange telephone services?		No. Please refer to BellSouth's response to Issue No. 1.
Issue 3: Is BellSouth's proposed late payment charge unjustly, unreasonably, unduly preferential or discriminatory?		No. Paying their phone bills by the due date can be difficult, if not impossible, for many state agencies because in many cases, only specified state employees have the statutory authority to approve the payment of such bills. Similar statutory authority concerns are not present in the case of private persons or private entities.
Issue 4: Is BellSouth's proposed late payment charge just and reasonable?		Yes. It is a standard and accepted practice for mortgage companies, health care providers, and other businesses to incent timely payment by collecting late payment charges. Like these other businesses, BellSouth reasonably incurs expenses in tracking, administering, and collecting payments from its customers after the payments are due. It is just and reasonable for BellSouth to collect costs associated with these late payments from the customers who cause BellSouth to incur these costs.

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

[X] Hand [ ] Mail [ ] Facsimile [ ] Overnight	Richard Collier, Esquire Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505
[ ] Hand [X] Mail [X] Facsimile [ ] Overnight	Vincent Williams, Esquire Consumer Advocate Division 426 Fifth Avenue North, 2nd Floor Nashville, Tennessee 37243

Patrick Turner

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