



Kristen E. Shore,
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FRN: 0020-8826-68

November 27, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

BellSouth Telecommunications, LLC (BellSouth) proposes to implement the new productivity offset (X-factor) adopted by the Commission in its Business Data Services Order FCC No. 17-43 (the "*Order*"), released April 28, 2017, and pursuant to DA 17-1009, released October 13, 2017. The *Order* established the X-factor at 2 percent for end user channel terminations and certain other non-competitive services, which will adjust price cap indexes (PCI) to account for productivity gains.

Based upon review and analysis of the PCI, BellSouth has determined that no rate adjustments are necessary to comply with the *Order*.

This letter and associated attachments are being filed electronically today via the Federal Communications Commission's Electronic Tariff Filing System (ETFS) in compliance with the electronic filing procedures.

Personal or facsimile service petitions against this Transmittal, as required under Section 1.773(a)(4) of the Commission's Rules, should be sent to Scott Murray, Area Manager – Regulatory Relations, 311 S. Akard St., Room 4-A28, Dallas, TX 75202, facsimile number (214) 486-8175. All other correspondence and inquiries concerning this Transmittal should be addressed to Debra L. Clemens, Director-Federal Regulatory, (202) 457-3066, 1120 20th Street, N.W., Suite 1000, Washington, D.C. 20036.

Sincerely,

A handwritten signature in cursive script that reads "Kristen E. Shore".

Attachments:

Tariff Review Plan
Rate Detail
Certification Letter