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May 14, 2002

Mr. William Caton, Acting Secretary
Federal Communications Commission
445 12th Street, SW - Room TW-B204
Washington, DC 20554

Re: Ex Parte Communication In the Matter of BellSouth Tariff FCC No. 1, Transmittal No. 629

Dear Mr. Caton:

Attached is a letter sent to Dorothy Attwood, Chief of the Wireline Competition Bureau from the American Petroleum Institute ("API"), eCommerce & Telecommunications Users Group ("eTUG"), and National Retail Federation ("NRF"). Copies were sent to Tamara Preiss, Deena Shetler, Judy Nitsche, Chris Barnekov, Jay Atkinson, Colleen Nibbe, Thad Machcinski, and Andy Mulitz.

Consistent with the Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the proceedings.

Sincerely,

Brian R. Moir
ETUG Counsel

May 14, 2002

Dorothy Attwood, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20544

Re: Ex Parte Communication In the Matter of BellSouth Tariff FCC No. 1, Transmittal No. 629

Dear Ms. Attwood:

After reviewing BellSouth's above referenced tariff filing, we are deeply disturbed that BellSouth is proposing to raise its business presubscribed interexchange carrier charge ("PICC") rates at least 15 percent. Under the veil of implementing thousands-block number pooling ("TBNP"), BellSouth maintains that its related implementation costs are $64 million. Both WCOM and AT&T have challenged BellSouth's assertions and submitted considerable compelling analysis to support their requests that the Commission reject or suspend BellSouth's tariff. We share their concern that BellSouth has not adequately proven that its alleged costs are justified and allowed under existing Commission rules.

Both when the Commission initially implemented its business PICC in 1977 and when it altered its business PICC in 2000, the Commission clearly indicated that business user PICCs would be experiencing annual decreases and almost total elimination by July 1, 2004 for the RBOCs. For instance in the Commission's May 25, 2000 *CALLS Analysis*, Appendix E clearly indicated that BellSouth's multi-line PICC should drop to $1.18 on July 1, 2002, less than seven weeks from now. Now, BellSouth is proposing to raise its business PICC rate from $2.95 to $3.38, a clear move in the opposite direction from what the Commission had been indicating.

Both WCOM and AT&T have raised a number of compelling concerns that warrant Commission action to prevent BellSouth from padding its books with higher PICC revenues at the expense of the rest of American business. Typically, the costs of numbering administration are treated as ordinary costs of doing business. Additionally, with the implementation of TBNP and the resulting extension of the likely number exhaustion date to well over a decade further into the future, BellSouth's resulting considerable savings have not been included in their analysis to more than offset any legitimate costs. The many issues raised by the BellSouth tariff should be dealt with in a full and open investigation, not in a hurried tariff transmittal.

The undersigned groups represent a significant cross-section of the American business end user community. It is that community that will bear the brunt of the BellSouth 15% PICC increases if they are allowed to take effect. We believe that our concerns warrant rejection of the BellSouth tariff or at a minimum a detailed analysis which can only be accomplished with a full investigation.

Sincerely,

American Petroleum Institute	eCommerce & Telecommunications Users Group	National Retail Federation
C. Douglas Jarrett	Brian R. Moir	Don Gilbert
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