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**Business Markets**

675 West Peachtree Street  
Atlanta, Georgia 30375

**Carrier Notification  
SN91086089**

Date: April 28, 2006

To: Competitive Local Exchange Carriers (CLEC), Interexchange Carriers (IXC) and  
Commercial Mobile Radio Service (CMRS) Providers

Subject: CLECs, IXCs and CMRS Providers – (Billing) – Clarification of BellSouth's Process for  
Investigating Delayed Billing Disputes for Disconnected Access Circuits that are billed  
via the Carrier Access Billing System

BellSouth Accounts Receivable Management Dispute Centers handle disputes for Access Services that are billed via the BellSouth Carrier Access Billing System (CABS). Carriers are submitting disputes stating "circuit disconnected, still billing", claiming the disconnect was issued over two (2) years ago.

As you may be aware, the statute of limitations for billing disputes regarding circuits purchased from the BellSouth Tariff FCC No. 1 is two (2) years and the statute of limitations for circuits purchased from the BellSouth State E tariffs varies from state to state. For circuits purchased from either the federal or the state tariff, BellSouth will only investigate the dispute back two (2) years. In the case of circuits purchased from the interstate tariffs, any adjustments found to be appropriate will be limited to two (2) years pursuant to the statute of limitations period set forth in the tariff. In the case of circuits purchased from the state tariffs, any adjustments found to be appropriate will be based on the statute of limitations for the state in which the circuit is provisioned.

BellSouth's process for resolving these disputes will be based upon the results of the investigation. Following are the most common results obtained, and an explanation of the investigation process for each:

- **Circuit Shown in Facilities Records and CABS with no Access Service Request (ASR):** If the investigation reveals that the circuit still exists in the BellSouth facilities records and billing systems and there is no evidence that the customer submitted an ASR to BellSouth to disconnect the circuit, the customer will be required to send a new disconnect request to initiate the disconnect of the circuit. After the new request is received and processed, BellSouth will adjust the account back to the date the dispute was received.
- **ASR Received and Circuit is in Facilities Records and CABS:** If the investigation reveals that BellSouth received an ASR to disconnect the circuit and the circuit is found in the facilities records and billing systems, BellSouth will initiate the disconnection of the circuit, with no further action required from the customer. BellSouth will adjust the customer's billing back to the date of the disconnect request per the ASR or for the applicable period based upon the statute of limitations, whichever is less.
- **Circuit Shown Only in CABS with no Record of ASR:** If the investigation reveals that the circuit exists only in CABS, is not found in the facilities records and there is no record of an ASR

requesting the circuit be disconnected, BellSouth will initiate the removal of the billing record, with no further action required from the customer. In this case, BellSouth will adjust the customer's account back to the date the customer indicates the circuit was to be disconnected or for the applicable period based upon the statute of limitations, whichever is less.

- **ASR Received and Circuit Shown Only in CABS:** If the circuit exists only in CABS, and the ASR requesting the disconnect is found, BellSouth will remove the billing record, with no further action required from the customer. BellSouth will adjust the customer's account back to the date of the disconnect as requested in the ASR or for the applicable period based upon the statute of limitations, whichever is less.

BellSouth encourages all customers to review bills promptly to ensure that the billing reflects the requested disconnection of circuits.

Please contact your BellSouth billing dispute representative with any questions.

Sincerely,

**ORIGINAL SIGNED BY KRISTEN E. SHORE**

Kristen E. Shore – Director  
Business Markets