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May 23, 2002

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Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 011077-TP (Competitive Practices)**

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Comments, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
(KA)

Nancy B. White

cc: Marshall M. Criser III  
Fordham R. Douglas Lackey  
Nancy B. White

AUS \_\_\_\_\_  
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Done 5/29/02

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**CERTIFICATE OF SERVICE**  
**Docket No. 011077-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via (\*) Facsimile and U. S. Mail this 23rd day of May, 2002 to the following:

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**(+) Signed Protective Agreement**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Generic Investigation Into Whether ) Docket No. 011077-TP  
Competitive Practices of Incumbent )  
And Alternative Local Exchange )  
Carriers Comply with Section )  
364.01(4)(G), F.S. ) Filed: May 23, 2002

**BELLSOUTH TELECOMMUNICATIONS, INC.'S COMMENTS**

Now comes BellSouth Telecommunications, Inc. ("BellSouth"), and in accordance with the discussion held at the May 2, 2002 workshop in the above captioned docket, provides the following comments:

Staff held a workshop on May 2, 2002 in Docket No. 011077-TP (Generic Investigation into whether competitive practices of Incumbent and Alternative Local exchange Carriers comply with Section 364.01(4)(G), F.S.) to discuss preferred carrier ("pic") freezes, specifically, pic freezes which may prevent carriers from proceeding to change an existing customer from resale to UNE-P. At the workshop BST stated that if an ALEC wanted to change wholesale services (from resale to UNE-P) when serving the same customer, and a local service freeze was on the account, the ALEC must submit two local service requests (LSRs). The first LSR was needed to remove the preferred carrier freeze, and a second LSR was needed to change from resale to UNE-P and to place the preferred carrier freeze back on the account. The process has recently been modified. Currently, ALECs are only required to submit one LSR to change wholesale services from resale to UNE-P when serving the same customer, even if the account has a pic freeze. In other words, the ALEC is no longer required to "un-freeze" the pic when changing from resale to UNE-P when serving the same

customer. This includes instances when a carrier may be using a different operating company name (OCN) when providing service as a reseller and as an UNE-P provider, as long as the underlying carrier is the same. This change is transparent to the end user and requires no action to be taken by the end user.

Respectfully submitted this 23rd day of May, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

(KA)

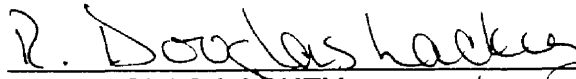
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