... WHAL

FILE COPY



MANCY B. WHITE Geraral Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404)335-0710

December 9, 1996

Mrs. Blanca S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

RE: Docket No.

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Comments. Please file these documents 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 on the parties shown on the attached Certificate of Service.

		Figure 1	
ACK	Servi	ice.	
AFA			Sincerely,
APP			a lite (Bt)
CAF			Maney E. white (Bd)
CMU	Shelfe,		Nancy B. White
CTR			•
EAG	Enclo	osures	
LE G	oc:	All Parties of Record	
LIN	3	A. M. Lombardo	
OPC		R. G. Beatty W. J. Ellenberg	
R CH		W. O. Effenberg	
SEC	1'		
WAS			

DOCUMENT NUMBER-DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 90001-TL In re: Petition by subscribers of the Groveland exchange for extended area service (EAS) to the Orlando, Winter Garden, and Windermere exchanges Petition by the residents Docket No. 930173-TL In re: of Polo Park requesting extended area service (EAS) between the Haines City) exchange and the Orlando, West Kissimmee, Lake Buena Vista, Windermere, Reedy Creek, Winter Park, Clermont, Winter Garden, and St. Cloud exchanges Docket No. 930235-TL Resolution by the Taylor In re: County Board of Commissioners for countywide extended area service (EAS)) within Taylor County In re: Resolution by Holmes County Docket No. 870248-TL Board of County Commissioners for extended area service in Holmes County) In re: Request by Gilchrist County Docket No. 870790-TL Commissioners for extended area service through Gilchrist County Docket No. 900039-TL In re: Resolution by the Orange County Board of County Commissioners for extended area service between the Mount Dora exchange and the Apopka, Orlando, Winter Garden, Winter Park, East Orange, Reedy Creek, Windermere, and Lake Buena Vista exchanges In re: Request by Bradford County Docket No. 910022-TL Commission requesting extended area service within Bradford County and between Bradford County, Union County,) and Gainesville

13129 DEC-9%

In re: Request by Volusia County Council for extended area service between the Sanford exchange (Osteen and Deltona) and the Orange City and Deland exchanges) Docket No. 910029-TL))))
In re: Request by Putnam County Board of County Commissioners for extended area service between the Crescent City, Hawthorne, Orange Springs, and Melrose exchanges, and the Palatka exchange	
In re: Request by Pasco County Board of County Commissioners for extended area service between all Pasco County exchanges) Docket No. 910529-Ti))))
In re: Request for extended area service between all exchanges within Volusia County by Volusia County Council	Docket No. 911185-TL))))
In re: Resolution by the Palm Beach County Board of County Commissioners for extended area) Docket No. 921193-TL)
service between all exchanges in Palm Beach County) Filed: December 9, 1996)

COMMENTS OF BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to the request made at the Staff Workshop held on November 18, 1996, in the above captioned matters, BellSouth makes the following comments:

- BellSouth reiterates the contents of its Brief filed on August 29, 1996 in Docket No. 941281-TL, as if set forth herein in its entirety.
- 2. At the Staff workshop, BellSouth agreed to investigate the possibility of whether a modification of the existing LATA boundary

could be accomplished. BellSouth has reviewed the Telecommunications

Act of 1996 and can find no procedure therein in which to request a

modification of a LATA boundary. It should be noted that any

modification of a LATA boundary automatically changes the calling

scope of a particular community. Such a change in calling scope could

deprive the community of certain ECS benefits.

3. Staff also suggested that one-way ECS service might be feasible in the above captioned dockets. BellSouth would note that BellSouth would most likely be required to apply terminating access rates when terminating EAS or ECS traffic originated by other local exchange companies.

Respectfully submitted this 9th day of December, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

70000

J. PHILLIP CARVER

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305)347-5555

William J. ELLENBERG II

NANCY B. WHITE

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0710

CERTIFICATE OF SERVICE Docket No. 941281-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 9th day of December, 1996 to the following:

Donna Canzano Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Alan N. Berg United Telephone Co. of Florida P.O. Box 5000 Altamonte Springs, FL 32715

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 South Gadsden Street Tallahassee, FL 32301

Mancy D. White (Bd)