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BELLSOUTH TELECOMMUNICATIONS, INC.

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March 26, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Betty Easley Conference Center, Rm. 110
Tallahassee, FL 32399-0850

Re: FPSC Docket No. 950737-TP

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time to File Cost Study, which we ask that you file in the above-captioned matter.

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

Thank you for your attention to this matter.

Sincerely yours,

Thomas B. Alexander
Thomas B. Alexander (TW)

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Green
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- CPC _____
- RCV _____
- SEL 1
- WAS _____
- OTH _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
Nancy B. White
William J. Ellenberg, II

DOCUMENT NUMBER-DATE
03190 MAR 26 5
FPSC-RECORDS/REPORTING

FILED
MAR 26 1997

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into Temporary Local)
Telephone Number Portability Solution to)
Implement Competition in Local Exchange)
Markets)
_____)

Docket No. 950737-TP

Filed: March 26, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'s MOTION FOR
EXTENSION OF TIME TO FILE COST STUDY**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") pursuant to Rule 25-22.006, Florida Administrative Code, hereby files a Motion for Extension Time. In support of the request, BellSouth states as follows:

1. By Order No. PSC-95-1604-FOF-TP, issued December 28, 1995, BellSouth Telecommunications, Inc. was directed to "file cost studies that identify the recurring and non-recurring costs associated with providing RCF for telephone number portability by March 31, 1997" The aforementioned Order was issued by this Commission after conducting an evidentiary hearing on October 20, 1995, where the various parties presented evidence and arguments on the remaining issues to be decided by this Commission, including the price to be charged for Remote Call Forwarding ("RCF"), and the cost recovery mechanism to be used for RCF. BellSouth, as well as other incumbent Local Exchange Carriers ("LECs") submitted cost studies for providing interim number portability as part of the evidence in the original proceeding before the Commission.

2. Subsequent to the Commission's decision, as represented by Order No. PSC-95-1604-FOF-TP in the first hearing of this matter, the Federal Communications

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Commission ("FCC") released its First Report and Order and Further Notice of Proposed Rulemaking on July 2, 1996, in the Matter of Telephone Number Portability, CC Docket No. 95-116 ("FCC First Report and Order"). In light of the FCC's First Report and Order, this Commission initiated a review of the impact of the FCC's First Report and Order on the cost recovery mechanism set forth in the Commission's Order No. PSC-95-1604-FOF-TP. Subsequently, the Commission held an evidentiary hearing on November 25, 1996, to address the issues identified in this current proceeding.

3. On February 6, 1997, the Staff issued its recommendation to the Commission with regard to the appropriate cost recovery mechanism for temporary number portability ("ISSUE NO. 2"). Staff indicated that although it believed that the cost methodology that best meets the FCC's Order is a pooling mechanism based on access lines, such a mechanism is too complicated to implement, especially for the time period that it would be used, therefore, Staff "recommend[ed] the Commission require all carriers to absorb their own costs of providing [interim local number portability] ILNP." See Staff recommendation, February 6, 1997, page 23.

4. During the Commission's Agenda Conference held on March 4, 1997, the Commission took up the Staff recommendation in this docket, however, the Commission decided to defer its decision in this docket until a subsequent agenda conference. See transcript of Agenda Conference, March 4, 1997, page 41.

5. Recently, the Staff released its revised recommendation to the Commission in this docket. However, the Staff has not changed its recommendation as to the cost recovery issue (ISSUE 2) in this proceeding. The Staff continues to

recommend that “the FPSC require all carriers to absorb their own costs of providing ILNP.” See Staff Recommendation, March 20, 1997, p. 25. BellSouth understands that the Commission will again, consider the Staff’s Recommendation in this docket at the Commission’s Agenda Conference Scheduled for April 1, 1997.

6. BellSouth has diligently worked on the cost study required by the Commission in its Order No. PSC-95-1604-FOF-TP which is due to be filed by BellSouth with the Commission on March 31, 1997. However, in light of the Staff recommendation that each party “absorb their own costs of providing ILNP”, such a cost study will be unnecessary and moot if the Commission determines to adopt the Staff’s recommendation on this issue. Additionally, continued preparation of this cost study at this time, when BellSouth is also diligently working on a number of other cost studies in light of the arbitration proceedings, and interconnection negotiation efforts it has undertaken, is of concern, particularly if the Commission determines to adopt the Staff’s proposed recommendation on this issue. Finally, such cost studies often contain proprietary and confidential information which will require additional steps to protect such information prior to the filing of the cost study, which may be a moot effort if the Commission determines in the near future that it will require the parties to simply absorb their own costs for providing interim number portability.

7. For the reasons discussed above, BellSouth respectfully requests that the Commission grant an extension of time in which BellSouth may file its cost study for providing interim number portability (i.e. RCF) until thirty (30) days after the Commission has rendered its decision in this docket concerning this issue.

WHEREFORE, BellSouth respectfully urges the Commission to extend the filing deadline set forth in its Order No. PSC-95-1604-FOF-TP until thirty (30) days after the Commission renders its decision in this docket on this issue.

Respectfully submitted this 26th day of March, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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Certificate of Service

Florida Docket #95-0737-TP

I, Thomas B. Alexander, hereby certify that on this 26th day of March 1997,
copies of the foregoing were sent via Federal Express to the following:

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