Nancy B. White Assistant General Counsel-Finnida **BellSouth Telecor** c o Nancy H Sims Suite 400 150 South Monroe Street Tallahassee Florida 32301 Telephone (305) 347-5558

June 27, 1997

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: Docket No. 970604-TP 311 Direct, Inc.

Dear Ms. Bayó:

Enclosed original and fifteen copies Telecommunications, Inc.'s Answer to 311 Direct, Inc.'s Petition for Transfer of N11 Code and Other Relief, which we ask that you file in the 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 have been served to the parties shown on the attached Certificate of Service.

ACK

ATA

Sincerely.

Nancy B. White (KR)

Nancy B White

Enclosures

cc: All parties of record A. M. Lombardo

R. G. Beatty

William J. Ellenberg II

CERTIFICATE OF SERVICE DOCKET NO. 970604-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 27 day of June, 1997 to the following:

Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

MUCHNICK, WASSERMAN & DOLIN Attorneys for 311 DIRECT, INC., Petitioner Presidential Circle 4000 Hollywood Boulevard Suite 710 North Hollywood, Florida 33021 Tel. No. (954) 989-8100 Tel. No. (305) 624-9100 Fax. No. (954) 989-8700

Nancy Bowhite (KR)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Transfer of N11)	Docket No .	970604-TP
Code by 311 Direct, Inc.)		
)	Filed June	27, 1997

BELLSOUTH TELECOMMUNICATIONS, INC.'S ANSWER TO 311 DIRECT, INC.'s PETITION FOR TRANSFER OF N11 CODE AND OTHER RELIEF

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files its Answer, pursuant to Rule 1.110, Florida Rules of Civil Procedure and Rules 25-22 037 and 25-22.0375, Florida Administrative Code, to the Petition for Transfer of N11 Code and Other Relief filed by 311 Direct, Inc. ("311 Direct"). BellSouth states the following

- 1. As to the allegations contained in Paragraph IA of the Petition, BellSouth admits that it has issued Tariff A39 and that N11 service codes are currently assigned on a first-come first-serve basis.
- 2. As to the allegations contained in Paragraph IB of the Petition, BellSouth admits that the tariff language is as stated
- 3 As to the allegations contained in Paragraph IC of the Petition, BellSouth admits that the tariff language is as stated
- 4. BellSouth admits the factual allegations contained in Paragraph IIA of the Petition
- 5. BellSouth admits the factual allegations contained in Paragraph IIB of the Petition



- 6. BellSouth admits the factual allegations contained in Paragraph IIC of the Petition.
- 7. As to the allegations contained in Paragraph IID of the Petition, these allegations are essentially legal in nature and, therefore, no response is required
- 8. As to the allegations contained in Paragraph IIE of the Petition, these allegations are essentially legal in nature and, therefore, no response is required
- 9. As to the allegations contained in Paragraph IIF of the Petition, these allegations are essentially legal in nature and, therefore, no response is required
- 10. BellSouth admits the factual allegations contained in Paragraph IIG of the Petition.
- 11. BellSouth admits the factual allegations contained in Paragraph IIH of the Petition. BellSouth notes, however, that the applicant for the 211 service code number in Orlando is in the process of activation.
- 12. As to the allegations contained in Paragraph IIIA of the Petition, this Paragraph states a request rather than factual allegations and, therefore, does not require a response.
- 13. BellSouth admits the factual allegations contained in Paragraph IIIB of the Petition

- 14. BellSouth admits the factual allegations contained in Paragraph IIIC of the Petition.
- 15. As to the allegations contained in Paragraph IIID of the Petition, BellSouth is without sufficient information or knowledge of the allegations concerning 311 Direct and, therefore, these allegations are deemed to be denied.
- 16. As to the allegations contained in Paragraph IIIE of the Petition, BellSouth admits that 311 Direct is a customer of BellSouth. BellSouth is without sufficient information or knowledge of the remaining allegations of Paragraph IIIE of the Petition and, therefore, these allegations are deemed to be denied.
- 17. As to the allegations contained in Paragraph IIIF of the Petition, this Paragraph states a request rather than factual allegations and, therefore, does not require a response.
- 18. As to the allegations contained in Paragraph IIIG of the Petition, BellSouth is without sufficient information or knowledge of the allegations concerning 311 Direct and, therefore, these allegations are deemed to be denied
- 19. As to the allegations contained in Paragr. ph IIIH of the Petition, BellSouth is without sufficient information or knowledge of the allegations concerning 311 Direct and, therefore, these allegations are deemed to be denied.

- 20. As to the allegations contained in Paragraph IIII of the Petition, this Paragraph states a request rather than factual allegations and, therefore, does not require a response.
- 21. As to the allegations contained in Paragraph IIIJ of the Petition, this Paragraph states a request rather than factual allegations and, therefore, does not require a response.
- 22. As to the allegations of Paragraphs A, B, C and D of the Wherefore
 Clause of the Petition, these Paragraphs state requests rather than factual allegations
 and, therefore, do not require a response.

Respectfully submitted this 27th day of June, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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