

**NANCY B. WHITE**  
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

July 3, 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. 970722-TP (YP-USA, Ltd.)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication, Inc.'s Answer to YP-USA, Ltd.'s Complaint, 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.

Sincerely,

*Nancy B. White*

Nancy B. White

(Apl)

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 5
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT # 970722-DAT

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PRINT

**CERTIFICATE OF SERVICE  
DOCKET NO. 970722-TP**

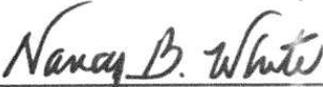
I HEREBY CERTIFY that a true and correct copy of the foregoing was

served by U.S. Mail this 3<sup>rd</sup> day of July, 1997 to the following:

William P. Cox  
Staff Counsel  
Florida Public Service  
Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
(904) 413-6199

Norman H. Horton, Jr.  
Gwen G. Jacobs  
Messer, Capareello & Self, P.A.  
215 South Monroe Street  
Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Magdalen Blessey Bickford, Esq.  
The SunShine Pages  
3445 North Causeway Blvd., 4th Floor  
Metairie, LA 70002

  
\_\_\_\_\_  
Nancy B. White (PA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of YP-USA, Ltd. ) Docket No. 970722-TP  
BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: July 3, 1997

**BELLSOUTH'S ANSWER TO YP-USA, LTD.'s COMPLAINT**

BellSouth Telecommunications, Inc., ("BellSouth"), 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 Complaint filed by YP-USA, Ltd. d/b/a The SunShine Pages ("SunShine Pages"). BellSouth states the following:

1. As to the allegations contained in Paragraph 1 of the Complaint, BellSouth admits that SunShine Pages is a customer of BellSouth. BellSouth is without sufficient information or knowledge of the remaining allegations of Paragraph 1 concerning SunShine Pages and, therefore, these allegations are deemed to be denied.
2. BellSouth admits the factual allegations contained in Paragraph 2 of the Complaint.
3. BellSouth denies the allegations contained in Paragraph 3 of the Complaint.
4. As to the allegations contained in Paragraph 4 of the Complaint, BellSouth is without sufficient information or knowledge of the allegations and, therefore, these allegations are deemed to be denied.

5. As to the allegations contained in Paragraph 5 of the Complaint, BellSouth is without sufficient information or knowledge of the allegations and, therefore, these allegations are deemed to be denied.

6. As to the allegations contained in Paragraph 6 of the Complaint, BellSouth is without sufficient information or knowledge of the allegations and, therefore, these allegations are deemed to be denied.

7. As to the allegations contained in Paragraph 7 of the Complaint, BellSouth admits that RCF provides for the forwarding of telephone calls. BellSouth further admits that prior to March 1, 1997, part of the rate charged for RCF was priced on a per minute usage basis and that the billing of RCF generated usage summaries. BellSouth denies the remaining allegations of Paragraph 7 due to insufficient knowledge or information.

8. As to the allegations contained in Paragraph 8 of the Complaint, BellSouth is without sufficient information or knowledge of the allegations and, therefore, these allegations are deemed to be denied.

9. As to the allegations contained in Paragraph 9 of the Complaint, BellSouth admits that as of March 1, 1997, the price for RCF was changed and the per minute rate was deleted. Usage summaries were no longer generated because usage was no longer captured. BellSouth denies the remaining allegations of Paragraph 9.

10. As to the allegations contained in Paragraph 10 of the Complaint, BellSouth admits that it has reestablished the call counting feature in order to generate usage summaries for BellSouth's RCF customers. BellSouth further

admits that it cannot reconstruct usage summaries because no usage was captured. BellSouth denies the remaining allegations of Paragraph 10.

11. As to the allegations of Paragraph 11 of the Complaint, these allegations are essentially legal in nature and, therefore, no response is required.

12. BellSouth denies the allegations of Paragraph 12 of the Complaint.

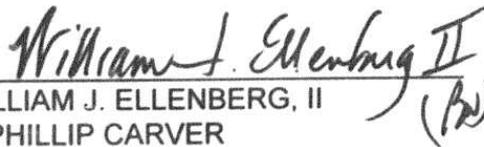
13. As to the allegations of the Wherefore Clause of the Complaint, these allegations state requests rather than facts and, therefore, do not require a response.

Respectfully submitted this 3rd day of July 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY  
NANCY B. WHITE  
c/o Nancy H. Sims  
150 South Monroe Street, Room 400  
Tallahassee, Florida 32301  
(305) 347-5555



WILLIAM J. ELLENBERG, II  
J. PHILLIP CARVER  
675 West Peachtree Street,

State of Florida

Commissioners:

JULIA L. JOHNSON, CHAIRMAN  
SUSAN F. CLARK  
J. TERRY DEASON  
JOE GARCIA  
DIANE K. KIESLING



DIVISION OF RECORDS &  
REPORTING  
BLANCA S. BAYÓ  
DIRECTOR  
(904) 413-6770

## Public Service Commission

June 16, 1997

Norman H. Horton, Jr., Esquire  
Messer, Caparello & Self Law Offices  
Post Office Box 1876  
Tallahassee, Florida 32302-1876

Re: Docket No. 970722-TP

Dear Mr. Horton:

This will acknowledge receipt of a complaint of UP-USA, Ltd. d/b/a The Sunshine Pages against BellSouth Telecommunications, Inc. regarding termination of message counts associated with RCF service, which was filed in this office on June 13, 1997 and assigned the above-referenced docket number. Appropriate staff members will be advised.

Mediation may be available to resolve any dispute in this docket. If mediation is conducted, it does not affect a substantially interested person's right to an administrative hearing. For more information, contact the Office of General Counsel at (904) 413-6078 or FAX (904) 413-6079.

Division of Records and Reporting  
Florida Public Service Commission

STATE OF FLORIDA

Commissioners:  
JULIA L. JOHNSON, CHAIRMAN  
SUSAN F. CLARK  
J. TERRY DEASON  
JOE GARCIA  
DIANE K. KIESLING



DIVISION OF RECORDS & REPORTING  
BLANCA S. BAYÓ  
DIRECTOR  
(904) 413-6770

NOTICE OF COMPLAINT

TO

**BELLSOUTH TELECOMMUNICATIONS, INC.**

Docket No. 970722-TP - Complaint of YP-USA, Ltd. d/b/a The Sunshine Pages against BellSouth Telecommunications, Inc. regarding termination of message counts associated with RCF service.

You are hereby notified that the above complaint, a copy of which is attached, has been filed with this Commission.

As required by the Commission's Rules of Practice and Procedure, you are directed to respond to this complaint by the close of business on **July 7, 1997**, and to serve a copy of your response on the complainant.

By **DIRECTION** Of The Florida Public Service Commission, this 16th day of June, 1997.

A handwritten signature in cursive script that reads "Blanca S. Bayó".

Blanca S. Bayó

BSB:mas

cc: Division of Legal Services  
Division of Consumer Affairs  
Division of Communications  
Office of Public Counsel  
The SunShine Pages  
Messer, Caparello & Self, P.A.