

ORIGINAL

Legal Department

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November 21, 1997

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

**RE: Undocketed - Review of Proposals for Expedited
Interconnection and Resale Complaint Procedures**

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 on the parties shown on the attached Certificate of Service.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG / _____
- LIN _____
- OPC _____
- RCH _____
- SEC / _____
- WAS _____
- OTH _____

Sincerely,

Nancy B. White (KR)

Nancy B. White

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

DOCUMENT NUMBER - DATE
11995 NOV 21 5
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Review of Proposals for)
Expedited Interconnection and)
Resale Complaint Procedures)

Undocketed

Filed: November 21, 1997

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

BellSouth Telecommunications, Inc., ("BellSouth"), pursuant to the Staff's request at the workshop held on November 14, 1997, in the above entitled matter, hereby files its comments on the proposals made.

BellSouth does not oppose the expedited procedures proposed by Staff in Option 1 and Option 2. BellSouth does, however, have some concerns. First, BellSouth believes that Option 1 should be available only if there are no issues of material fact and only if all parties agree. If one of these criteria is not present, BellSouth believes Option 2 would be appropriate. Second, the issue identification process should be held earlier in the proceeding. TCG's suggested time frame would put the Issue ID conference after testimony is filed in Option 2. If new issues arise as a result of this conference, there is no opportunity to address those issues in testimony. Third, the suggested time frame by TCG has responses due within five days of the complaint in Option 1 and within ten days of the complaint in Option 2. This time frame is not reasonable. The complainant will have had ample time to draft the complaint, but the respondent will have only a few days to gather the information necessary to

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respond. Fourth, the Staff needs to take into account the dispute resolution procedures present in the various interconnection agreements in drafting expedited procedures.

BellSouth believes that the Staff's proposals could be implemented without rulemaking. The proposal set forth by MCI, however, would require rule changes. Further BellSouth has several concerns with the MCI proposal. First, BellSouth believes that the injunction type of proceeding suggested by MCI may well be beyond the authority of this Commission. Second, the response times in MCI's proposal are unreasonable. Third, the interim ruling suggested by MCI may cause the complaint to be prejudged. Fourth, MCI's proposal appears not to require hearing before the Commission, as represented either by the full Commission or a panel. BellSouth believes that, at the least, hearings should be held before a panel of Commissioners. These comments do not include all of BellSouth's concerns with MCI's proposal, but rather are a representative sample.

Respectfully submitted this 21st day of November, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (kr)

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CERTIFICATE OF SERVICE
Undocketed - Review of Proposals for Expedited
Interconnection and Resale Complaint Procedures

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Hand-Delivery this 21st day of November, 1997 to the following:

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

Nancy B. White (KE)
Nancy B. White