

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

May 1, 1998

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

Re: Docket Nos. 870248-TL, 870790-TL, 900039-TL, 910022-TL, 910528-TL, 910529-TL, 911185-TL, 921193-TL and 930173-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, 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 have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Narcy B. White (Bu)

NBW/vf

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

DOCUMENT NUMBER-DATE

04954 MAY-18

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution by Holmes County Board of County Commissioners for extended area service in Holmes County. Docket No. 870248-TL

In re: Request by Gilchrist County Commissioners for extended area service throughout Gilchrist County. Docket No. 870790-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, Ease Orange, Reedy Creek, Windmere, and Lake Buena Vista exchanges.

Docket No. 900039-TL

In re: Resolution by Bradford County Commission requesting extended area service within Bradford County and between Bradford County, Union County and Gainesville. Docket No. 910022-TL

In re: Request by Putnam County Board of County Commissioners for extended service between the Crescent City, Hawthorne, Orange Springs, and Melrose exchanges, and the Palatka exchange.

Docket No. 910528-TL

In re: Request by Pasco County Board of County Commissioners for extended service between all Pasco County exchanges.

Docket No. 910529-TL

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 service between all exchanges in Palm Beach County. Docket No. 921193-TL

In re: Petition by the Residents 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. 930173-TL

Filed May 1, 1998

PREHEARING STATEMENT OF BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure and Consolidating Dockets for Hearing Purposes Only (Order No. PSC-97-1462-PCO-TL), issued by the Florida Public Service Commission (FPSC) on November 20, 1997, hereby submits its Prehearing Statement for Docket Nos. 870248-TL, 870790-TL, 900039-TL, 910022-TL, 910528-TL, 910529-TL, 911185-TL, 921193-TL and 930173-TL.

A. Witnesses

BellSouth proposes to call the following witness to offer direct and rebuttal testimony on the issues in this docket:

Witness Issue(s)

Conrad D. Martin (Direct) All

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on May 15, 1998.

B. Exhibits

Conrad D. Martin

None

BellSouth reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

The routes at issue in these combined dockets that involve a BellSouth exchange are as follows:

Docket Number	Route	BellSouth Exchange
870248-TL	Ponce DeLeon and Defuniak	Graceville
	Springs to Graceville	
870790-TL	Branford and High Springs to	Trenton
	Trenton	
900039-TL	Mt. Dora to Apopka,	East Orange and Orlando
	Orlando, Winter Garden,	
	Winter Park, East Orange,	
	Reedy Creek, Windermere	
	and Lake Buena Vista	
910022-TL	Lawtey, Raiford and Starke	Gainesville
	to Gainesville	
910528-TL	Interlachen to Hawthorne and	Hawthorne, Keystone
	Keystone Heights;	Heights and Palatka
	Florahome to Keystone	
	Heights and Melrose; Orange	
	Springs to Palatka	
910529-TL	Hudson to Brooksville	Brooksville
911185-TL	Orange City to Daytona	Daytona Beach, New Smyrna
	Beach, New Smyrna Beach,	Beach, Oak Hill, Pierson and
	Oak Hill, Pierson and	DeLeon Springs.
	DeLeon Springs.	

Docket Number	Route	BellSouth Exchange
921193-TL	Clewiston to Belle Glade	Belle Glade
930235-TL	Cross City to Keaton Beach and Perry	Cross City
930173-TL	Haines City to Orlando, West Kissimmee, Lake Buena Vista, Windermere, Reedy Creek, Winter Park, Clermont, Winter Garden and St. Cloud.	Orlando

Since the above-referenced routes carry interLATA traffic, BellSouth does not have any traffic data for them. In Order No. PSC-93-1168-FOF-TL, the Commission recognized that this data was not available to BellSouth and relieved it of the requirement to file traffic data on the subject routes. Without this data, BellSouth cannot take a position as to whether a sufficient community of interest exists to justify one-way extended calling service (ECS) as a method to provide toll relief for the subject routes. If the Commission determines that a sufficient community of interest does exist on the subject routes and orders that one-way ECS be provided, BellSouth may only terminate the interLATA traffic on these routes. BellSouth recommends that terminating switched access rates be utilized as the appropriate rates for terminating traffic on the routes.

D. BellSouth's Position on the Issues

Issue 1: Is one-way ECS appropriate on the routes in question?

<u>Position</u>: In the absence of traffic data on the subject routes, BellSouth does not have a position on whether one-way ECS is appropriate.

Issue 2: If one-way ECS is appropriate, what rate, if any, should BellSouth charge to terminate ECS interLATA traffic for all carriers?

<u>Position</u>: BellSouth recommends that terminating switched access rates be utilized as the appropriate rates for terminating traffic on the subject routes

Issue 3: If one-way ECS is ordered on the routes in question and a termination charge is deemed appropriate, what economic impact with this have on the originating LECs?

<u>Position</u>: BellSouth does not have sufficient information to take a position on the economic impact that one-way ECS with a termination charge would have on the originating LECs.

<u>Issue 4</u>: If one-way ECS is appropriate, what rate structure and rate levels should the LECs charge?

<u>Position</u>: BellSouth does not have sufficient information to take a position on the rate structure and rate levels that should be utilized by the originating LECs.

E. Stipulations

There are no stipulations of which BellSouth is aware.

F. Pending Motions

There are no pending motions at this time.

G. Other Requirements

BellSouth knows of no requirement set forth in any prehearing order with which it cannot comply.

Respectfully submitted this 1st day of May, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

GEORGE B. HANNA

c/o Nancy Sims

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CERTIFICATE OF SERVICE

Docket Nos. 870248-TL, 870790-TL, 900039-TL, 910022-TL, 910528-TL, 910529-TL, 911185-TL, 921193-TL and 930173-TL

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

by U.S. Mail this 1st day of May, 1998 to the following:

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