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January 5, 2001
Via Hand Delivery

Walter D'Haeseleer
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Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, FL 32399-0870

Re: Docket No. 960786-TP

Dear Mr. D'Haeseleer and Ms. Bayo:

It has come to our attention that on December 21, 2000, BellSouth wrote to the Commission concerning its intent to file testimony in the above docket at the end of January 2001. In addition to communicating its intent to file testimony and outlining its interpretation of the Commission's prior order, BellSouth also made several requests regarding the hearing and decision schedule for this case. It concluded its letter by stating that it "welcomes the opportunity to meet with the Staff of the Commission within the next few weeks in order to discuss these issues and a formal procedural schedule...."

The undersigned are intervenors and interested parties in this docket. Therefore, we request that notice of any meetings to discuss the issues in or the scheduling of this case be provided to all interested parties. In this way, all parties will be able to provide input to the Commission to ensure the appropriate handling of this matter. For example, we suggest that the Commission should, at a minimum, require completion of all dockets related to competitive issues¹ as well as completion of

¹Docket No. 000121-TP, Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies; Docket No. 000075-TP, Investigation into appropriate methods to compensate carriers for exchange of traffic subject to Section 251 of the Telecommunications Act of 1996;

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the OSS test. The Commission should also review other issues that are essential to competition, and should consider (for example) advising BellSouth that it will be required to provide nondiscriminatory electronic access to preordering, ordering, billing, maintenance and repair functionalities for xDSL services and line-splitting capability, which have been recognized as "critical components" of competition. Moreover, the Commission should recognize that the OSS test is merely a review of those OSS functions that BellSouth actually offers at this time; a "successful" test, therefore, does not mean that BellSouth has met the appropriate checklist item.

Additionally, prior to entertaining a 271 application, the Commission should require and review a period of at least 90 days of actual commercial experience following completion of the OSS test. The requirement for actual commercial experience may help to avoid some of the problems experienced in New York after commercial operation began there. Pennsylvania has recently adopted such a requirement.

The undersigned competitive providers have made it clear to BellSouth, as well as to the FCC, that much more work remains to be done in Florida before BellSouth can be considered to have opened its local markets to competition. We appreciate your consideration in this matter and would welcome the opportunity to meet with Staff and all parties to discuss our concerns about the future of local telephone competition in Florida. Please contact any of the undersigned should you have any questions.

Sincerely,



Joseph A. McGlothlin

Vicki Gordon Kaufman

Attorneys for the Florida Competitive Carriers Association

Docket No. 990649-TP, Investigation into pricing of unbundled network elements; Docket Nos. 981834-TP, 990321, Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory; Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with the obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

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Cc: Marshall M. Criser III
Parties of record