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May 25, 2001

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

RECEIVED-FPSC
01 MAY 25 PM 4:54
RECORDS AND REPORTING

Re: Docket No.: 990649-TP

Dear Ms. Bayo:

On behalf of Z-Tel Communications, Inc., I am enclosing the original and 15 copies of the Response of Z-Tel to Motion by WorldCom and AT&T to Require BellSouth to Authorize use of BSTLM and to Require Verison to Provide Data and Inputs for the BSTLM.

Please return a date stamped copy of this letter and the pleading to me. Thank you for your assistance in this matter.

Yours truly,



Joseph A. McGlothlin

JAM/mls
Enclosure
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056617 MAY 25 2001

McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into) Docket No. 990649-TP
Pricing of Unbundled Network Elements)
_____) Filed:

**RESPONSE OF Z-TEL TO MOTION BY WORLDCOM AND AT&T TO
REQUIRE BELL SOUTH TO AUTHORIZE USE OF BSTLM AND TO REQUIRE
VERIZON TO PROVIDE DATA AND INPUTS FOR THE BSTLM**

Z-Tel Communications, Inc., through its undersigned counsel, responds to the Motion to Require BellSouth to Authorize use of its BSTLM and to Require Verizon to Provide Data and Inputs for the BSTLM Filed by AT&T Communications of the Southern States, Inc. ("AT&T") and MCI WorldCom, Inc. and its operating subsidiaries ("WorldCom"), and states:

1. On May 17, 2001, WorldCom and AT&T moved for an order requiring BellSouth to authorize WorldCom and AT&T to use BellSouth's BSTLM cost model for the purpose of developing proposed UNE rates for Verizon and requiring Verizon to provide data and inputs for that purpose.

2. Z-Tel agrees with the reasoning that underlies the motion of WorldCom and AT&T. Z-Tel supports and joins in the motion, provided (a) the ruling of the Commission authorizes Z-Tel to participate in the use of the BSTLM model and the associated data and inputs from Verizon and (b) the continuance sought by Verizon and AT&T in their motion is restricted to a delay of no more than ninety days from the existing hearing schedule.

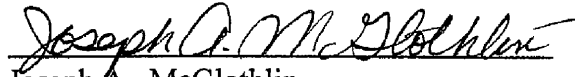
3. Because of the importance to Z-Tel of establishing cost-based UNE rates for Verizon as soon as is reasonably possible, Z-Tel would oppose the motion if granting the motion would delay the setting of revised UNE rates for Verizon by a period greater than ninety days.

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FPSC-RECORDS/REPORTING

4. Z-Tel also submits that in the event the motion is granted, effective with the currently scheduled decision date the Commission should place Verizon's existing UNE rates under a refund condition, subject to a true up based on the UNE rates ultimately established in this case.



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ATTORNEYS FOR Z-TEL COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Motion to Require BellSouth to Authorize use of its BSTLM, to Require Verizon to Provide Data and Inputs for the BSTLM, and to Continue the Hearing has been furnished by hand delivery(*) or U.S. mail on this 25th day of May, 2001 to:

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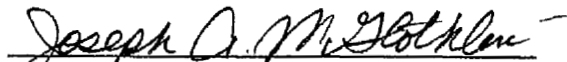
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