

ORIGINAL

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

Petition of AT&T Communications  
of the Southern States, Inc., TCG  
South Florida, and MediaOne Florida  
Telecommunications, Inc. for Structural  
Separation of BellSouth Telecommunications, Inc.

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Docket No.: 010345-TP

**MOTION TO CLARIFY AND AMEND AT&T'S  
PETITION FOR STRUCTURAL SEPARATION**

In accordance with Rules 28-106.202 and 28-106.204, Florida Administrative Code, AT&T Communications of the Southern States, Inc., TCG South Florida, Inc., and MediaOne Florida Telecommunications, Inc., (collectively, "AT&T"), submits this motion to clarify and amend the original petition filed in this docket on March 21, 2001.

This amendment serves only to clarify that AT&T requests the Commission to enter all relief necessary or appropriate under the circumstances. AT&T is confident that the facts ultimately found in evidentiary proceedings will demonstrate that structural separation is the necessary and most appropriate relief. But while structural separation is the best remedy, it is not the only remedy available to the Commission. The facts determined at hearing might compel relief more substantial, less substantial, or just different than structural separation.

The proposed Clarified and Amended Petition makes this clarification explicit. The Commission should institute appropriate evidentiary proceedings and order all relief necessary or appropriate – including structural separation and all other relief the facts ultimately warrant.

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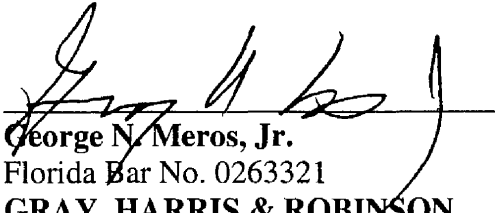
This amendment is procedural and will cause no prejudice to BellSouth, or affect its substantive rights.

Undersigned counsel contacted counsel for BellSouth regarding this motion and reports that BellSouth can neither object nor agree to the motion on this date. If BellSouth objects, it will file such opposition timely. If it consents, it will so notify the parties and Commission.

Respectfully submitted this 20<sup>th</sup> day of June, 2001.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Clarify and Amend At&T's Petition For Structural Separation has been furnished by U.S.

Mail service this 20<sup>th</sup> day of June, 2001 to the following:

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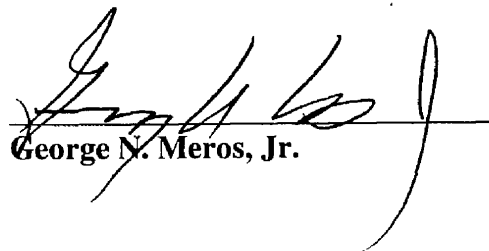
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