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August 27, 2001

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket No. 010740-TP (IDS Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion to Defer OSS Issue to Generic Docket Addressing Third Party Testing of BellSouth's OSS, 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 to the parties shown on the attached Certificate of Service.

Sincerely,

Patrick Turner

Patrick Turner (LA)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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CERTIFICATE OF SERVICE
Docket No. 010740-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (*), (**)Electronic Mail and (***) Federal Express this 27th day of August, 2001 to the following:

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Andrew D. Shore (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc.)	Docket No.: 010740-TP
n/k/a IDS Telecom, L.L.C., Against)	
BellSouth Telecommunications, Inc., and)	
Request for Emergency Relief)	Filed: August 27, 2001
_____)	

BELLSOUTH'S MOTION TO DEFER OSS ISSUE TO GENERIC DOCKET ADDRESSING THIRD PARTY TESTING OF BELLSOUTH'S OSS

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204 of the Florida Administrative Code, respectfully requests that the Commission issue an Order deferring Issue number 1, which asks whether BellSouth has breached its Interconnection Agreement with IDS Long Distance, Inc. n/k/a IDS Telecom, L.L.C. ("IDS") by failing to provide IDS OSS at parity, to the generic docket in which the Commission is addressing third party OSS testing to determine if BellSouth is providing ALECs, including IDS, OSS at parity, Docket No. 960786-TP. In support of this motion, BellSouth shows the Commission that:

1. On May 11, 2001, IDS filed a complaint against BellSouth alleging, among other things, that BellSouth has breached its interconnection agreement with IDS by failing to provide IDS OSS at parity.
2. On July 18, 2001, the Commission issued its Order Establishing Procedure in this docket, Order No. PSC-01-1501-PCO-TP. The list of issues in this proceeding is set forth in Appendix A to the Procedural Order. Issue No. 1

states: "Has BellSouth breached its interconnection agreement with IDS by failing to provide IDS OSS at parity."

3. One of the purposes of Docket No. 960786-TP is to conduct third-party testing of BellSouth's OSS. In that docket, the Commission will determine whether BellSouth is providing IDS and other ALECs OSS at parity in compliance with the Telecommunications Act of 1996 and the parity provisions in all of BellSouth's interconnection agreements.

4. It would be inefficient for the parties and for the Commission to devote their limited resources to addressing the issue of whether BellSouth is providing IDS OSS at parity both in this Complaint proceeding and also in the generic third-party testing proceeding. It is common practice before the Commission to defer issues that impact multiple ALECs from two-party proceedings to generic proceedings where doing so will allow the Commission to eliminate these types of inefficiencies and the potential for inconsistent results, and so that it can decide significant issues on the most complete record possible. For example, multiple issues were deferred recently from arbitrations to the Commission's generic ISP docket for the same reasons it makes sense to defer the OSS issue from this proceeding to the generic OSS third-party test docket. Moreover, the Commission has stated previously that issues related to BellSouth's OSS will be addressed in its generic docket and, therefore, are inappropriate for hearing in other proceedings. See Order Nos. PSC-01-1025-PCO-TL, at 4; PSC-99-1568-PAA, at 10; PSC-0101025-PCP-TL, at 5.

5. For the reasons set forth above, the Commission should defer the issue in this proceeding that deals with whether BellSouth is providing OSS at parity to the generic proceeding the Commission established for the purpose of answering that question.

6. Pursuant to Rule 28-106.204 of the Florida Administrative Code, counsel for BellSouth conferred with counsel for IDS with respect to this Motion, and IDS' counsel stated that IDS objects to this Motion.

Respectfully submitted this 27th day of August, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

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c/o Nancy H. Sims

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