

ORIGINAL

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October 24, 2003

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COMMISSION
CLERK

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


Re: Docket No. 030339-TP (Allegiance Arbitration)

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Prehearing Statement of BellSouth Telecommunications, Inc., 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,


Andrew D. Shore (CB)

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

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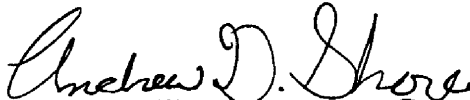
**CERTIFICATE OF SERVICE
DOCKET NO. 030339-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (*), Electronic Mail, Facsimile (**) and U.S. Mail this 24th day of October 2003 to the following:

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Andrew D. Shore (CB)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Allegiance Telecom of Florida, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection and Resale Agreement with BellSouth Telecommunications, Inc. Under the Telecommunications Act of 1996)	
)	
)	Docket No. 030339-TP
)	
)	Filed: October 24, 2003
)	

PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Revised Order Establishing Procedure (Order No. PSC-03-0927-PCO-TP) issued on August 13, 2003, hereby submits its Prehearing Statement.

A. Witnesses

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

Witness

Kathy K. Blake (Direct and Rebuttal)

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct and rebuttal testimony, and witnesses to address issues not presently designated that may be designated by the Prehearing Officer.

B. Exhibits

Kathy K. Blake (Rebuttal):

KKB-1	BellSouth's correspondence to AT&T regarding AT&T's New Business Request
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BellSouth reserves the right to file exhibits to any 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.

D. BellSouth's Position on the Issues

The unresolved issues, the section in the agreement where they arise, and BellSouth's position on each issue are set forth below. In some instances where Allegiance has failed to state the issue accurately in a fair, neutral manner, BellSouth has restated the issue.

ISSUE A: What is the Commission's jurisdiction in this matter?

*** The Commission has jurisdiction in this matter pursuant to 47 U.S.C. § 252.

ISSUE 2: Following a request by Allegiance to convert a special access arrangement to a combined loop and transport network element (EEL), when should BellSouth cease billing the special access rate and begin to bill the lower UNE rate for the EEL?

*** At the time BellSouth completes the work necessary to effectuate the conversion. BellSouth's published Guidelines set forth the time intervals pursuant to which BellSouth will perform the work necessary to convert special access arrangements to UNE EELs. ***

ISSUE 7: When should payment for services be due?

*** Payment should be due on the specified bill date, which is the same each month. It is not necessary to allow Allegiance a full 30 days after receiving its bill to

make payment, especially since it can elect to receive its bills electronically so as to minimize any delay in bill printing and receipt. ***

ISSUE 8: When is it appropriate to demand a security deposit, in what amount, and under what conditions should the security deposit be released?

*** BellSouth should be permitted to obtain a security deposit in an amount up to two months of Allegiance's estimated billings. The amount of the deposit should be based on Allegiance's overall credit worthiness, not merely its payment history. ***

ISSUE 9: How far may BellSouth back bill for all services?

*** Pursuant to this Commission's Rules, back billing should be limited to one year. An exception is appropriate in situations where BellSouth's billing is dependent upon information provided by a third party or by Allegiance and BellSouth does not timely receive information needed to correct billing errors. ***

E. Stipulations

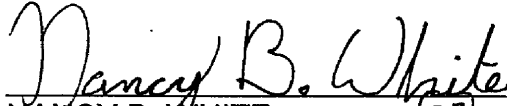
None.

F. Pending Motions

BellSouth is not aware of any pending motions in this docket.

Respectfully submitted this 24th day of October 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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