J. Phillip Carver Senior Attorney

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December 30, 2003

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 COMMISSION CLERK

Re: <u>Docket Nos. 981834-TP and 990321-TP (Generic Collocation)</u>

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Revised 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,

RECEIVED & FILED

PSC-BUREAU OF RECORDS

J. Phillip Carver

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

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CERTIFICATE OF SERVICE Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Hand Delivery (*), First Class U.S. Mail and Electronic Mail this 30th day of December,

2003 to the following:

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J. Phillip Carver
J. Phillip Carver (14)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive) .	
Carriers for Commission Action)	Docket No. 981834-TP
To Support Local Competition)	
In BellSouth's Service Territory)	•
In re: Petition of ACI Corp. d/b/a)	
Accelerated Connections, Inc. for)	Docket No. 990321-TP
Generic Investigation into Terms and)	
Conditions of Physical Collocation)	
•)	Filed: December 30, 2003

REVISED PREHEARING STATEMENT OF BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), hereby submits its Prehearing Statement, in compliance with the Order Establishing Procedure (Order No. PSC-02-1513-PCO-TP), issued November 4, 2002, and the Third Order Modifying Procedure (Order No. PSC-03-1311-PCO-TP) issued November 17, 2003.

A. Witnesses

BellSouth proposes to call the following witness to offer direct and rebuttal testimony on the issues in this matter:

<u>VVitness</u>	<u>lssues</u>	
W. Bernard Shell	9A, 9B, 10	

The above-identified witness presents both facts and policy considerations that support BellSouth's positions on these issues. BellSouth has made a good-faith attempt to identify the issues to which the witness' testimony primarily

relates. However, this witness' testimony may also relate to other issues in this docket.

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

B. Exhibits

W. Bernard Shell	WSB-1	Collocation Cost Study (Revised)
	WSB-2	Cost Summary (Revised)
	WSB-3	Element Description
	WSB-4	Investment Data for Element H.1.8
	WSB-5	Investment Data for Element H.1.41

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 the Rules of the Commission.

C. Statement of Position

BellSouth has proposed an appropriate list of elements for collocation, and rates for those elements, as well as definitions and terms and conditions. In each instance, BellSouth's proposal is compliant with TELRIC, compliant with the previous Orders of this Commission, and should be approved by the Commission.

D. BellSouth's Position on the Issues

<u>Issue 9A</u>: For which collocation elements should rates be set for each ILEC?

<u>Position</u>: Rates should be set for those elements identified in the testimony of BellSouth witness, W. Bernard Shell. Generally, the collocation elements can be grouped into the following four types: 1) Physical Collocation, 2) Virtual Collocation, 3) Adjacent Collocation, and 4) Remote Terminal Collocation.

Issue 9B: For those collocation elements for which rates should be set, what is the proper way and the appropriate application of those rates?

<u>Position</u>: Proposed rates should be upon a forward looking cost study that adheres to the Total Element Long Run Incremental Cost (TELRIC) pricing rules and utilizes the cost study methodology previously approved by this Commission. Each of the rates proposed by BellSouth in the testimony of its witness, W. Bernard Shell, complies with these standards, and each should be approved.

<u>Issue 10</u>: What are the appropriate definitions, and associated terms and conditions for the collocation elements to be determined by the Commission?

Position: The appropriate definitions, terms and conditions for the cost elements proposed by BellSouth are set forth in Exhibit WBS-3 to the testimony of BellSouth's witness, W. Bernard Shell. The Commission should approve these definitions, terms and conditions.

E. Stipulations

The parties have entered into no stipulations at this time.

F. Pending Motions

Various Motions to Compel Discovery filed by AT&T and Covad are pending.

G. Other Requirements

BellSouth knows of no requirements set forth in any Procedural Order with which it cannot comply.

Respectfully submitted this 30th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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