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March 29, 2004

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. 030869-TP: Petition by BellSouth Telecommunications, Inc. to Reduce its Network Access Charges Applicable to Intrastate Long Distance in a Revenue-Neutral manner

Docket No. 030867-TP: Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes

Docket No. 030868-TP: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes

Docket No. 030961-TP: Flow-through of LEC Switched Access Reductions by IXC's, Pursuant to Section 364.163(2), Florida Statutes

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s and BellSouth Long Distance Inc.'s Response to Attorney General's Amended Request for Oral Argument, which we ask that you file in the captioned dockets.

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,


Nancy B. White (R#)

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

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket Nos. 030867-TP, 030868, 030869-TL and 030961-TP

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

Electronic Mail and First Class U. S. Mail this 29th day of March, 2004 to the following:

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Nancy B. White (KA)

(+) Protective Agreement
(*) Hand Delivered

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Verizon) DOCKET NO. 030867-TL
Florida Inc. to reform)
intrastate network access and)
basic local telecommunications)
rates in accordance with Section)
364.164, Florida Statutes.)

In re: Petition by Sprint-) DOCKET NO. 030868-TL
Florida, Incorporated to reduce)
intrastate switched network)
access rates to interstate)
parity in revenue-neutral manner)
pursuant to Section 364.164(1),)
Florida Statutes.)

In re: Petition for implementation) DOCKET NO. 030869-TL
of Section 364.164, Florida Statutes,)
by rebalancing rates in a revenue-)
neutral manner through decreases)
in intrastate switched access charges)
with offsetting rate adjustments)
for basic services, by BellSouth)
Telecommunications, Inc.)

In re: Flow-through of LEC) DOCKET NO. 030961-TI
switched access reductions by IXCs,)
pursuant to Section 364.163(2),)
Florida Statutes.)

Filed: March 29, 2004

**RESPONSE OF BELL SOUTH TELECOMMUNICATIONS, INC. AND BELL SOUTH
LONG DISTANCE, INC. TO ATTORNEY GENERAL'S
AMENDED REQUEST FOR ORAL ARGUMENT**

NOW come BellSouth Telecommunications, Inc. ("BellSouth") and BellSouth Long Distance, Inc. ("BellSouth Long Distance") and file this Response to the Amended Request for Oral Argument filed by Charles J. Crist, Jr., Attorney General, State of Florida ("Attorney General") and state:

1. On December 24, 2003, the Florida Public Service Commission (“Commission”) issued Order No. PSC-03-1469-FOF-TL, granting BellSouth’s Petition to reduce its intrastate switched network access rates in a revenue neutral manner. The Commission found that the Petition met the statutory criteria set forth in Section 364.164, Florida Statutes. Order, p.47. The Attorney General appealed this Order to the Florida Supreme Court (“Court”) on January 7, 2004. On January 8, 2004, the Attorney General filed a Motion for Reconsideration and Request for Oral Argument with the Commission and a Motion to Relinquish Jurisdiction with the Court. On March 3, 2004, the Court granted the Motion for Relinquishment, stating that jurisdiction was relinquished to the Commission “for the specific purpose of ruling on the January 8, 2004 motions for reconsideration.” Court Order, p. 1, Case No.: SC04-9. BellSouth filed its response to the Attorney General’s Motion for Reconsideration and Request for Oral Argument on March 15, 2004, pursuant to Commission Order No. PSC-04-0037-PCO-TL, issued on January 13, 2004.

2. On March 17, 2004, the Attorney General filed an Amended Request for Oral Argument. In his Amended Request, the Attorney General at first merely repeated the same arguments he had made in his original request. In addition, however, the Attorney General appeared to be of the misconception that an actual evidentiary hearing was to be held on the reconsideration. Based on that misconception, the Attorney General has now asked that the information BellSouth and BellSouth Long Distance submitted in these dockets as confidential and that has been ruled as such by the Commission should now nonetheless be disclosed.

3. The Attorney General's Amended Request should be rejected for several reasons. First, as previously noted in the Response of BellSouth and BellSouth Long Distance to the Attorney General's Motion for Reconsideration and Motion for Oral Argument filed on March 15, 2004, oral argument is unnecessary. The Commission considered all the evidence and heard all of the arguments at the hearing in December of 2003. Nothing in the Attorney General's Amended Request identifies with any particularity why oral argument would aid the Commission.

4. Second, the Attorney General's Amended Request should be rejected as untimely pursuant to Rule 25-22.058(1), Florida Administrative Code. Under this Rule, a request for oral argument must accompany the pleading upon which argument is requested.

5. Third, the Attorney General's Amended Request should be rejected as an improper attempt to enlarge the scope of the relinquishment granted by the Florida Supreme Court. As noted above, the Court specifically held that the relinquishment was for the sole purpose of considering the Attorney General's January 8, 2004, Motion for Reconsideration. In its Amended Request, the Attorney General is attempting to expand the January 8, 2004 Motion for Reconsideration by adding an issue on whether certain documents provided by BellSouth and BellSouth Long Distance during the course of the dockets should remain confidential. This should not be allowed.

7. Throughout the course of these dockets, BellSouth and BellSouth Long Distance, in response to interrogatories and requests for production of documents from various parties and Staff, have provided information, some of which BellSouth and BellSouth Long Distance classified as proprietary confidential business information

pursuant to Section 364.183(3), Florida Statutes. This information consisted of, for example, information proprietary to vendors, cost information, and other information that, if not protected, would give competitors an unfair competitive advantage. When such information was provided or made a part of the record, BellSouth and BellSouth Long Distance followed the requirements of Section 364.183(2), Florida Statutes in order to protect the information. Essentially, BellSouth and BellSouth Long Distance filed with the Commission Requests for Confidential Classification on the information deemed by BellSouth and BellSouth Long Distance to be proprietary confidential business information. Pursuant to Rule 25-22.006(4)(c), Florida Administrative Code, BellSouth and BellSouth Long Distance were required to demonstrate that the information was indeed proprietary confidential business information.

8. At no time during the course of this proceeding did the Attorney General object to any Requests for Confidential Classification filed by BellSouth and BellSouth Long Distance.

9. The Commission evaluated each of the requests for confidentiality made by BellSouth and BellSouth Long Distance and issued orders either granting or denying confidential classification.

10. At no time during this proceeding has the Attorney General moved for reconsideration of any order by the Commission granting confidential classification to BellSouth and BellSouth Long Distance.

11. Finally, it should be noted that the Attorney General had full and complete access to any material that was classified as confidential. Moreover, in no way did the

classification of certain information as confidential interfere with the Attorney General's ability to make whatever point he wished to make.

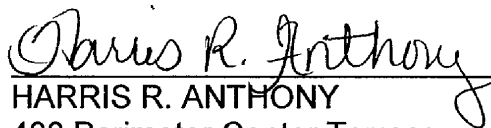
WHEREFORE, for all the reasons set forth above, BellSouth and BellSouth Long Distance, respectfully request that the Amended Request of the Attorney General be denied.

Respectfully submitted this 29th day of March, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC. BELLSOUTH LONG DISTANCE, INC.



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