

J. Phillip Carver  
General Attorney

BellSouth Telecommunications, Inc.  
c/o Nancy H. Sims  
Suite 400  
150 So. Monroe Street  
Tallahassee, Florida 32301  
Telephone: 305 347-5558

ORIGINAL  
FILE COPY

June 25, 1996

Ms. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Rm. 110  
Tallahassee, Florida 32399-0850

Re: **Docket No. 960687-TP**  
**Contract Service Arrangements Tariff**

Dear Mrs. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Answer To Intermedia's Petition, 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.

ACK

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Sincerely yours,

*J. Phillip Carver (BK)*

J. Phillip Carver

Enclosures

cc: [unclear] All Parties of Record  
R. G. Beatty  
A. M. Lombardo  
R. Douglas Lackey

RECEIVED

*[Signature]*  
FLORIDA DEPARTMENT OF RECORDS

DOCUMENT NUMBER-DATE

06797 JUN 25 1996

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Contract Service ) Docket No. 960687-TP  
Arrangements Tariff of BellSouth )  
Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: June 25, 1996

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
ANSWER TO INTERMEDIA'S PETITION**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rule 25-22.037, Florida Administrative Code, hereby files its Answer to the Petition of Intermedia Communications of Florida, Inc. ("Intermedia") and states the following.

1. As to the allegations of Paragraph 1, BellSouth is without knowledge of the allegations set forth therein. Accordingly they are deemed to be denied.

2. As to the allegations of Paragraph 2, BellSouth is without knowledge of the allegations set forth therein. Accordingly they are deemed to be denied.

3. As to the allegations of Paragraph 3, BellSouth denies that it is engaging in any "ultra vires use of CSAs." BellSouth is without knowledge of the remaining allegations of Paragraph 3, and they are, accordingly, deemed to be denied.

4. As to the allegations of Paragraph 4, these allegations are admitted.

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5. As to the allegations of Paragraph 5, these allegations are admitted.

6. As to the allegations of Paragraph 6, these allegations are denied.

7. In response to Paragraph 7 of the Petition, this paragraph primarily contains legal interpretations rather than factual allegations and, accordingly, no response is required. To the extent the allegations of Paragraph 7 are intended to be factual, however, BellSouth denies these allegations.

8. As to the allegations of Paragraph 8, these allegations are denied.

9. As to the allegations of Paragraph 9, these allegations are denied.

10. As to the allegations of Paragraph 10, these allegations are denied.

11. As to the allegations of Paragraph 11, these allegations are denied.

12. As to the allegations of Paragraph 12, this paragraph contains a request for relief rather than any factual allegations and, accordingly, no response is necessary. BellSouth, however, denies that the Petitioner is entitled to the relief requested.

13. As to the allegations of Paragraph 13, this paragraph contains no factual allegations and, accordingly, no response is necessary.

Respectfully submitted this 25th day of June, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (BL)

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J. PHILLIP CARVER  
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Atlanta, GA 30375  
(404) 335-0747

CERTIFICATE OF SERVICE  
DOCKET NO. 960687-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 25<sup>th</sup> day of June, 1996 to the following:

Patrick K. Wiggins  
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Patricia Kurlin  
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111 West Madison Street  
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Tallahassee, FL 32399-1400

*J. Phillip Carver (sd)*  
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