

NANCY B. WHITE
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404)335-0710

August 23, 1996

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

960833-TP

RE: Docket No. ~~960833-TP~~

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to MCI's Motion for Two-Day Partial Extension of Time. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (NW)

- ACK
- AFA
- APP
- CAF
- CMU *Reith*
- OTR
- SLD
- WAS
- OTH

Enclosures

- cc: All Parties of Record
- A. M. Lombardo
- R. G. Beatty
- W. J. Ellenberg

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09024 AUG 23 1996

FPSC-DIVISION OF RECORDS AND REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 960833-TP
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 23rd day of August, 1996 to the following:

Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904)425-6364
(904)425-6343 (fax)

Donna Canzano
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
(904)413-6204

Robin D. Dunson, Esq.
1200 Peachtree Street, NE
Promenade I, Room 4038
Atlanta, GA 30309
(404)810-8689

Mark A. Logan, Esq.
Brian D. Ballard, Esq.
Bryant, Miller & Olive, P.A.
201 S. Monroe Street
Tallahassee, FL 32301
(904)222-8611

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32314
(904)222-7500

Nancy B. White (pw)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI for)
arbitration of certain terms and)
conditions of a proposed agreement)
with BellSouth Telecommunications,) Docket No. 960846-TP
Inc. concerning interconnection)
and resale under the) Filed: August 23, 1996
Telecommunications Act of 1996)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE
TO MCI'S MOTION FOR TWO-DAY PARTIAL EXTENSION OF TIME

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company") and hereby responds to MCI's Motion for Two-Day Partial Extension of Time, as follows:

1. Through its Motion, MCI asks the Commission to extend the date for pre-filing direct testimony. In Order No. PSC-96-1039-PCO-TP, the Prehearing Officer granted MCI's and AT&T's joint motion to consolidate their proceedings and directed MCI to file its direct testimony by August 21, 1996. In its Motion, MCI states that it is unable to meet that date because of the multitude of proceedings it is involved in and because certain exhibits will not be ready on August 21, 1996.

2. This is the second time since consolidation was granted that MCI has filed a motion adding something new to the morass that is this docket. First, MCI filed its "Mediation Plus" motion, seeking bifurcation of the arbitration, and thereby complicating an already complex and compressed proceeding.

3. MCI eagerly sought consolidation of their arbitration and AT&T's and knew that there were deadlines that were associated with the granting of that request. MCI waited until the day testimony was due to advise the parties and the Prehearing Officer that MCI

would fail to meet those deadlines. MCI's actions have shown that, as BellSouth pointed out initially, forcing consolidation is not tenable and will put a strain on the parties, and unfairly prejudice BellSouth. The issue of whether consolidation should be maintained must be revisited, particularly in light of the request ACSI has made to be included in that consolidation.

4. In the event that MCI's motion is granted, BellSouth requests the Prehearing Officer to grant BellSouth an equivalent extension to that date BellSouth is required to file responsive testimony. Such an extension will be required because MCI's action deprives BellSouth of two days that are precious because of the already truncated schedule.

WHEREFORE, BellSouth requests that the Commission revisit the matter of whether consolidation should be maintained. In the event MCI's Motion is granted, BellSouth requests an equivalent extension for filing its responsive testimony.

Respectfully submitted this 23rd day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (sw)

ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Nancy H. Sims
150 South Monroe Street, Room 400
Tallahassee, Florida 32301
(305) 347-5555

William J. Ellenberg II

WILLIAM J. ELLENBERG II
NANCY B. WHITE
675 West Peachtree St., Room 4300
Atlanta, Georgia 30375
(404) 335-0710