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ORIGINAL
FILE COPY

March 4, 1997

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

Re: FPSC Docket No. 920260-TL

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Palm Beach Newspapers, Inc.'s Request for Oral Argument on Motion for Reconsideration, which we ask that you file in the above captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies of BellSouth's Request have been served to the parties shown on the attached Certificate of Service.

Thank you for your attention to this matter.

Sincerely yours,

Edward L. Rankin III

Edward L. Rankin, III

ER

- ACK _____
- AFA 3 _____
- APP _____
- CAF _____
- CMU Norton _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN 5 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg, II

DOCUMENT NUMBER-DATE

02334 MAR-45

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of))
the Revenue Requirements and) Docket No. 920260-TL
Rate Stabilization Plan of))
Southern Bell Telephone and) Filed: March 4, 1997
Telegraph Company))
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO PALM BEACH
NEWSPAPERS, INC.'S REQUEST FOR ORAL ARGUMENT ON MOTION FOR
RECONSIDERATION

BellSouth Telecommunications, Inc. (BellSouth), pursuant to
Commission Rule 25-22.058, hereby files its Response to Palm
Beach Newspapers, Inc.'s (PBN) Motion for Oral Argument on Motion
for Reconsideration. In support of its Response, BellSouth
states as follows:

1. BellSouth has filed contemporaneously with this pleading
its Response to PBN's Motion for Reconsideration of Order No.
PSC-97-0128-FOF-TL.

2. As BellSouth explains in that Response, PBN's Motion for
Reconsideration merely reargues the same positions it submitted
to the Commission through the testimony of James Freeman. The
Commission's Order reflects that the Commission considered PBN's
request for rate reductions to BellSouth's N11 service and
concluded that it was not appropriate to use the funds at issue

in this proceeding to reduce N11 prices. Accordingly, BellSouth has asked the Commission to deny the Motion for Reconsideration.

3. PBN has failed to set forth a single compelling reason for the Commission to entertain oral argument on its Motion for Reconsideration. PBN first contends that oral argument is necessary because of PBN's belief that the Commission had "overlooked or failed to consider PBNI's confidential post-hearing brief." Setting aside the question of whether the brief was in fact read, based upon PBN's representation of what the brief says, it is clear that the brief contains the same arguments that PBN has advanced in its Motion. If it so chooses, the Commission can easily re-read the brief in deciding whether to grant PBN's Motion. Oral argument is not necessary for PBN to explain what it has already explained in its brief.

PBN then complains that because the parties stipulated the pre-filed testimony and exhibits into the record and waived a hearing, the Commission needs oral argument to better understand PBN's position. PBN voluntarily waived its right to present oral testimony and cross-examine witnesses, just like all other parties. Simply because PBN may now believe that waiver of a hearing was not in its best interest does not warrant use of more

Commission time to convince the Commission that it should change its mind on the N11 service issue.

Finally, PBN contends that oral argument is needed for the Commission to hear PBN's argument that N11 service "competition...will not deliver more rationale pricing to N11 customers." Again, this is hardly a persuasive reason to grant PBN's request for oral argument. Despite PBN's purported discussion of this argument in its brief, the Commission found as follows:

Given the forthcoming requirements that LECs offer their services for resale by CLECs, it is possible that information service providers will have opportunities to purchase N11 service from alternative providers in the future. When that occurs, ISPs would have the opportunity to select a provider of N11 Service. We find that is not appropriate to use the funds at issue in this proceeding to reduce N11 Service usage rates.

(Order, p. 28). That PBN is disappointed that the Commission does not share its same conclusion with respect to the prospect of competition for N11 service is insufficient to grant PBN's request for oral argument.

WHEREFORE, BellSouth respectfully requests that the Commission deny PBN's request for oral argument.

Respectfully submitted this 4th day of March, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 4th day of March, 1997 to:

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