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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)	
Communications of the Southern)	Docket No. 960833-TP
States, Inc., MCI)	Docket No. 960846-TP
Telecommunications Corporation, and))	
MCI Metro Access Transmission)	
Services, Inc.,)	
for arbitration of certain terms)	
and conditions of a proposed)	Filed: March 7, 1997
agreement with BellSouth)	
Telecommunications, Inc.)	
concerning interconnection and)	
resale under the)	
Telecommunications Act of 1996.)	
)	

**MCI'S RESPONSE TO BELLSOUTH'S MOTION FOR
EXTENSION OF TIME TO FILE INTERCONNECTION AGREEMENT**

MCI Metro Access Transmission Services, Inc. and MCI Telecommunications Corporation (collectively, "MCI") hereby respond to BellSouth's Motion for Extension of Time to File Interconnection Agreement.

1. On February 21, 1997, the Commission disposed of BellSouth's and AT&T's motions for reconsideration of Order No. PSC-96-1579-FOF-TP (Arbitration Order) and resolved the disputed contract provisions in the agreements filed by BellSouth and MCI.

2. At that time, the Commission also approved the staff's verbal recommendation that the parties be required to submit a final contract incorporating the Commission's decisions within two weeks from the date of the vote, or by March 7, 1997.

3. While there was considerable discussion by the Commission of the staff's recommendation, MCI believes that the

Commission's rulings on the motions for reconsideration and the disputed contract language, as reflected in the motions adopted by the Commission, are clear. MCI has worked with BellSouth to finalize the contract language, and believes that the parties have developed language that accurately reflects the Commission's decisions.

4. MCI has two local switches in place in Florida. Further delay in finalizing the arbitrated agreement will have an adverse impact on MCI's entry into the local markets and will provide BellSouth with an additional time period during which it continues to be sheltered from competition. MCI therefore opposes BellSouth's motion for extension of time.

5. BellSouth has refused to finalize the arbitrated agreement unless and until there is an affirmative decision of the Commission denying its motion for extension of time. MCI therefore urges the Commission to act as quickly as possible to deny BellSouth's request.

6. In the event the Commission determines that the filing deadline should be extended until after the issuance of an order reflecting the decisions made on February 21, 1997, MCI opposes allowing an additional two weeks after that date to make the requisite filing. MCI believes that the Commission's decisions have already been accurately incorporated in the current draft of the agreement based on the results of the agenda conference, and that the additional effort (if any) required to make the

agreement conform to the Commission's order could be finished in five business days or less following issuance of the order.

WHEREFORE, MCI urges that BellSouth's motion for extension of time be denied. In the event any extension is granted, MCI urges that the period of extension be made as short as possible, and not extend for two weeks beyond the date of entry of the Commission's order on reconsideration.

RESPECTFULLY SUBMITTED this 7th day of March, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

Richard D. Melson
P.O. Box 6526
Tallahassee, FL 32314
(904) 425-2313

and

MARTHA MCMILLIN
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342
(404) 843-6375

ATTORNEYS FOR MCI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 7th day of March, 1997.

Monica Barone
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Nancy White
c/o Nancy Sims
BellSouth Telecommunications
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Tracy Hatch
AT&T
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

Floyd R. Self
Norman H. Horton, Jr.
Messer, Caparello, Madsen,
Godlman & Metz
215 S. Monroe St., Ste. 701
Tallahassee, FL 32301

and by UPS Delivery to:

Nancy White
BellSouth Telecommunications
675 West Peachtree St., Ste. 4300
Atlanta, GA 30375

Robin D. Dunson
AT&T
Room 4038
1200 Peachtree St. NE
Atlanta, GA 30309

Robin D. Dunson

Attorney