

NANCY B. WHITE  
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.  
180 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(306) 347-6688

January 26, 1998

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32309

RE: Docket No. [REDACTED] 1 (Slamming)

Dear Mrs. Bayo:

Pursuant to the direction of Prehearing Officer Johnson at the prehearing conference held on January 23, 1998, the following constitutes BellSouth's position on the new issues:

Issue 1: Should the Commission adopt the new rule 25-24.485, Florida Administrative Code?

BellSouth's Position: Yes. Any rules applicable to local exchange companies should be applicable to ALECS.

Issue 2: Should the Commission adopt the amendments to Rule 25-4.003, Florida Administrative Code?

BellSouth's Position: Yes, with the exception of 25-4.003(41), Rule 25-4.003(41) should be modified to include the option of accepting a PIC freeze from the customer directly over the phone. Paper PIC freeze forms should not be required.

Issue 3: Should the Commission adopt the amendments to Rule 25-24.110, Florida Administrative Code?

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP 2  
CAF 2  
CMU 2  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 1  
LIN 5  
MCO \_\_\_\_\_  
MCH \_\_\_\_\_  
MCI 1  
MIS \_\_\_\_\_  
MTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

[REDACTED] JAN 26 8

FPSC-RECORDS/REPORTING

**BellSouth's Position:** Yes, with the exception of Rule 25-4.110(10), (11)(a)(3), (12), and (13). These sections should be modified due to the space limitations of BellSouth's bill, the cost involved, whether BellSouth will have such information in its possession, and technical obstacles.

**Issue 4:** Should the Commission adopt the amendments to Rule 25-4.118, Florida Administrative Code?

**BellSouth's Position:** Yes, with the exception of 25-4.118(8). This section should be modified to eliminate the opportunity for undue financial gain by an unauthorized provider and eliminate the financial loss by the authorized provider, while maintaining the customer's financial responsibility for services rendered.

**Issue 5:** Should the Commission adopt the amendments to Rule 25-24.490, Florida Administrative Code?

**BellSouth's Position:** Yes, These rules should be applicable to interexchange carriers.

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 (AW)

Enclosures

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

**CERTIFICATE OF SERVICE  
DOCKET NO. 97082-TI**

**I HEREBY CERTIFY that a true and correct copy of the foregoing was served  
via U. S. Mail this 26th day of January, 1998 to the following:**

**Charles J. Beck  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street  
Suite 812  
Tallahassee, FL 32399-1400**

**Michael Gross  
Assistant Attorney General  
Office of the Attorney General  
Department of Legal Affairs  
The Capital, FL-01  
Tallahassee, FL 32399-1050**

**C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
305 South Gadsden Street  
Post Office Drawer 1170  
Tallahassee, FL 32302**

**Benjamin Fincher  
Sprint Communications Company  
Limited Partnership  
3100 Cumberland Circle  
Atlanta, GA 30339**

**Andrew Iear  
Telecommunications Resellers  
Association  
Post Office Box 2461  
Gig Harbor, WA 98335-4461**

**Marsha Rule, Esq.  
Tracy Hatch, Esq.  
AT&T Comm. of the Southern States  
101 North Monroe Street  
Suite 701  
Tallahassee, FL 32301**

**Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
501 East Tennessee Street  
Suite B  
Post Office Drawer 1657  
Tallahassee, FL 32302**

**Diana Caldwell, Esq.  
Division of Appeals  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850**

**Walter D' Haeseleer  
Director of Communications  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850**

**Ky E.B. Kirby  
Warren A. Fitch  
Don W. Blevins  
SWINDLER & BERLIN, CHTD.  
3000 K Street, N.W.  
Washington, D.C. 20007**

**Richard D. Nelson**  
P.O. Box 6526  
Tallahassee, FL 32314

**Thomas K. Bond**  
MCI Telecommunications Corp.  
780 Johnson Ferry Road  
Suite 700  
Atlanta, GA 30342

**Peter M. Dunbar**  
**Barbara D. Auger**  
Pennington, Moore, Wilkinson  
& Dunbar, P.A.  
Post Office Box 10095  
Tallahassee, FL 32302  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126

**Carolyn Marek**  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
Post Office Box 210706  
Nashville, TN 37221  
Tel. No. (615) 673-1191  
Fax. No. (615) 673-1192

**Suzanne Fannon Summerlin**  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301

**Charles Rehwinkel**  
Sprint/United Florida  
Sprint/Centel Florida  
P.O. Box 2214  
Tallahassee, FL 32316

**Anthony P. Gillman**  
**Kimberly Caswell**  
GTE Florida Incorporated  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Tel. (813) 483-2615

**Steve Brown**  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33610-1309

  
Nancy B. White