

ORIGINAL

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BellSouth Telecommunications, Inc.
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February 6, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 971314-TP (Sprint Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, 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 have been served to the parties shown on the attached Certificate of Service.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2 NBW/mf
- LIN 2
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Sincerely,

Nancy B. White (KR)

Nancy B. White

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of Sprint Communications) Docket No.: 971314-TP
 Company Limited Partnership, d/b/a)
 Sprint, and Sprint Metropolitan Networks,)
 Inc., Against BellSouth Telecommunica-)
 tions, Inc.)
 _____) Filed: February 6, 1998

PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-97-1614-PCO-TP) issued December 23, 1997, submits its Prehearing Statement for Docket No. 971314-TP.

A. Witnesses

BellSouth proposes to call the following witness to offer testimony on the issues set forth in this matter:

- | | | |
|-----------------|-----------------------|--------------------|
| Jerry W. Moore | (Direct and Rebuttal) | Issues 1 and 3 |
| W. Keith Milner | (Direct and Rebuttal) | Issues 2, 4, and 5 |

BellSouth reserves the right to call witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on March 16, 1998.

B. Exhibits

- | | | |
|----------------|-------|--|
| Jerry W. Moore | JWM-1 | Special Study -
Return of FOCs to Sprint
and Total ALECs |
| | JWM-2 | Recommended UNE
Provisioning Targets |

W. Keith Milner

None

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

BellSouth has made a good faith effort to comply with all the requirements and obligations of the Sprint/BellSouth Interconnection Agreement. While there have been start-up problems, BellSouth believes that the problems alleged by Sprint have been or are in the process of being resolved and that no action is necessary by this Commission. BellSouth is fully committed to continued, cooperative efforts.

D. BellSouth's Position on the Issues

Issue No. 1: Has BellSouth provided Firm Order Confirmation in a timely and accurate manner as agreed to by BellSouth and SMNI?

A. If not, what relief, if any, is appropriate?

Position: Yes. While there were some problems early in the process, BellSouth has added service representatives and improved operating systems to properly handle this function.

A. No relief is necessary.

Issue 2: Has BellSouth identified provisioning problems in a timely manner to enable SMNI to meet customer due dates at parity with the service provided by BellSouth to its retail customers?

A. If not, what relief, if any, is appropriate?

Position: Yes. BellSouth has used its best efforts to identify such problems and resolve them in a timely manner.

A. No relief is necessary.

Issue 3: Has BellSouth provided installation intervals for service established via unbundled loops in accordance with the interconnection agreement between BellSouth and SMNI?

A. If not, what relief, if any, is appropriate?

Position: Yes. BellSouth has fulfilled the requirements of its interconnection agreement with Sprint with the installation intervals BellSouth has offered.

A. No relief is necessary.

Issue 4: Has BellSouth disconnected customers seeking to migrate to SMNI service prior to the designated cut over date?

A. If so, what relief, if any, is appropriate?

Position: Once. On July 8, 1997, a customer incurred a service outage because of a due date change by Sprint. There is no continuing problem.

A. No relief is necessary.

Issue 5: Has BellSouth caused service interruptions to SMNI customers due to call routing errors, translations problems, or failure to properly implement interim number portability?

A. If so, what relief, if any, is appropriate?

Position: BellSouth is aware of one incident involving the incorrect settings of the Simulated Facilities Group ("SFG"). This problem was corrected and BellSouth instituted special training for technicians who make changes to the SFG.

A. No relief is necessary.

E. Stipulations

There are no stipulations of which BellSouth is aware.

F. Pending Motions

There are no pending motions at this time.

G. Other Requirements

BellSouth knows of no requirement set forth in any prehearing order with which it cannot comply.

Respectfully submitted this 6th day of February, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ke)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

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**CERTIFICATE OF SERVICE
DOCKET NO. 971314-TP**

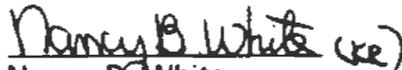
I HEREBY CERTIFY that a true and correct copy of the foregoing was served
via U. S. Mail this 6th day of February, 1998 to the following:

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Nancy B. White