

NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5558

February 9, 1998

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

Re: 950985-TP Approval of the Stipulation, Section 252(e)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response in Opposition of Florida Cable Telecommunication's Association, which we ask that you file in the 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.

Sincerely,

Nancy B. White
Nancy B. White (PW)

ACK _____
AFA _____
APP Smith _____
CAF _____
CMU 2 _____
CTR _____
EAG _____
LEG T _____
LIN 5 _____
OFC _____
RCH _____
SEC T _____
WAS _____
YTH _____

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

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
02048 FEB-98
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 950985-TP**

I HEREBY CERTIFY that a copy of the foregoing has been

furnished by U.S. Mail this 9th day of February, 1998 to:

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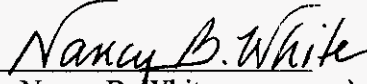
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ENGLEWOOD, CO 80112


Nancy B. White (NW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida Statutes)
_____)

Docket No. 950985-TP

Filed: February 9, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE IN OPPOSITION OF FLORIDA CABLE
TELECOMMUNICATIONS ASSOCIATION**

BellSouth Telecommunications, Inc. pursuant to Rule 25-22.037, Florida Administrative Code , hereby submits its Response to the Opposition of the Florida Cable Telecommunications Association, Inc.'s ("FCTA") to BellSouth's Request for Section 252(e) Approval of the Stipulation entered in PSC Docket No. 950985-TP. BellSouth sets forth its position as follows:

1. On January 22, 1998, BellSouth submitted to the Florida Public Service Commission ("Commission") the Stipulation regarding interconnection of networks entered into pursuant to state law in Docket No. 950985-TP. On January 27, 1998, the FCTA filed an opposition to BellSouth's request.

2. The FCTA opposed BellSouth's request as to the FCTA on the grounds that the agreement has expired as between the FCTA and BellSouth. BellSouth agrees and regrets that it did not make more clear the fact that BellSouth is not seeking Section 252(e) approval as to the FCTA or any other signatory, but only as to Continental Cable Corporation (now known as Media One). Thus, the FCTA's opposition appears to be moot on this point.

DOCUMENT NUMBER-DATE

02048 FEB-98

FPSC-REG/REGS/REPORTING

3. The FCTA also opposes BellSouth's request with regard to Continental Cablevision on the grounds that BellSouth did not submit the addenda extending the agreement. A copy of that addenda is attached hereto as Exhibit "A".

4. Third, the FCTA objects to BellSouth's request that an expired agreement be approved. Once again, BellSouth is not seeking approval of the agreement as to any signatory other than Continental Cablevision, with whom the agreement is still in effect.

5. Finally, the FCTA complains that BellSouth's request was filed without the FCTA's knowledge of consent. BellSouth understands the concern of the FCTA since the FCTA was under the mistaken impression that BellSouth was seeking approval of an agreement between BellSouth and the FCTA. That, however, is not the case. BellSouth is seeking 252(e) approval of the agreement between BellSouth and Continental Cablevision only. This is being done to satisfy the requirements of Order No. PSC-97-1459-FOF-TL. Although this agreement was negotiated pursuant to state law, that fact is not a bar to Section 252(e) approval.

WHEREFORE, BellSouth requests the Commission to approve BellSouth's request for 252(e) approval of the Stipulation entered in PSC Docket No. 950985-TP as it applies to BellSouth and Continental Cablevision.

Respectfully submitted this 9th day of February, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY

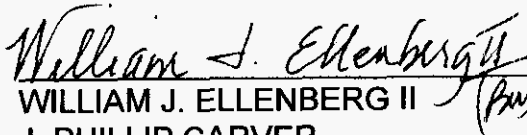
NANCY B. WHITE

c/o Nancy Sims

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(305) 347-5555



WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

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Atlanta, Georgia 30375

(404) 335-0711



Bellsouth Telecommunications Inc.
Room 3100 BellSouth Center
670 West Peachtree Street, N.E.
Atlanta, Georgia 30375

February 5, 1998

Herb Popko
MedioOne Telecommunications of Florida, Inc.
Suite 270
7000 Belfort Parkway
Jacksonville, FL 32206

Dear Mr. Popko:

On January 1, 1998 the Stipulation and Agreement between BellSouth Telecommunications, Inc. and Continental Cablevision, Inc., now operating as MedioOne Telecommunications of Florida, Inc., expired. Since January 1, 1998, BellSouth and Medio One have continued to exchange traffic and operate under the terms of the Stipulation and Agreement. The purpose of this letter is to formalize an understanding that BellSouth and MedioOne will continue to operate under the Stipulation (as well as the Trial Trunking Arrangement entered into on February 14, 1997) for a period of 180 days or until an Interconnection Agreement is successfully negotiated, whichever time period is earlier. Should negotiations for such an agreement not succeed within the stated time, the provisions of the Stipulation and Agreement would continue to apply until the parties have an opportunity to arbitrate pursuant to state and federal law. Please indicate your concurrence by signing below and faxing a copy of this letter to me at 404/525-7838.

As information BellSouth sent its standard Interconnection Agreement to Mr. Schaiden of your company on September 16, 1997 for review. During the balance of 1997, he and other MedioOne representatives discussed many aspects of it with various representatives of BellSouth. Despite the best efforts of both companies, we have not yet entered into a new interconnection agreement as a replacement for the Stipulation and Agreement. However, I am sure your company will join us in pledging to exert greater efforts toward this goal.

Please call me should you have any questions regarding the above. I can be reached at (404) 927-7513.

Sincerely,

Pat Finlen
Manager - Interconnection Services

Concurred by:

Gary Lane
Vice President - Telephony

EXHIBIT "A"