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May 26, 1998

ORIGINAL

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 960833-TP, 960846-TP & 960757-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc., in the above dockets, are the original and 15 copies of MCI's Response to BellSouth's Motion for Reconsideration.

By copy of this letter, this document has been provided to the parties on the attached service list.

Very truly yours,

Richard D. Melson

Richard D. Melson

- ACK 1
- AFA 3
- APP RDM/clp
- Enclosures
- CAF cc: Parties of Record
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petitions by AT&T Communications of the Southern States, Inc.; MCI Telecommunications Corporation; MCI Metro Access Transmission Services, Inc. for arbitration of terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning Interconnection and resale under the <u>Telecommunications Act of 1996.</u>	}	Docket No. 960833-TP Docket No. 960846-TP
In the Matter of MFS Communications Company, Inc. Petition For Arbitration Pursuant To 47 U.S.C. Sec. 252(b) of Interconnection Rates, Terms, and Conditions with BellSouth Telecommunications, Inc.	}	Docket No. 960757-TP Filed: May 26, 1998

**RESPONSE OF MCI TELECOMMUNICATIONS CORPORATION
TO BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR RECONSIDERATION**

Comes Now MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. ("MCI") and hereby submits to the Florida Public Service Commission ("PSC" or "Commission") this response to the Motion for Reconsideration filed by BellSouth Telecommunications, Inc. ("BellSouth" or "BST") in this matter. BST has identified three issues on which they based their motion. Those issues are addressed as follows:

First, BellSouth argues that the ACAC portion of the Connect and Turn-Up Test costs should be restored. BellSouth argues that the ACAC was not "explicitly formed to deal with ALECs" as stated in the Order and that the job function codes identified with ACAC describe provisioning functions and activities, not ordering functions. While BellSouth indignantly

proclaims that the exact words “explicitly formed to deal with ALECs” do not appear in the transcript, the Order accurately paraphrased the testimony of BellSouth’s witness. On cross-examination, Mr. Landry stated that the ACAC was “set up specifically to respond to ALEC needs as far as single points of contact.” (Landry, T. 539)

BellSouth’s TELRIC cost study input forms on Excel spreadsheets describe ACAC as a manual coordination and dispatch function (see, e.g., spreadsheets F2WADSL.XLS, FL2WHDSL.XLS, LCLCDS1.XLS). In his deposition, Mr. Landry described the function of the ACAC as follows: “They coordinate the turn up of the service; . . . and, in general, are set up for the CLEC, like I said, as a single point of contact to address issues about those specific services.” (Ex. 16, Deposition of Mr. Landry, p. 42) He also testified: “And the ACAC center – that is now called the UNE, or U-N-E center – was established specifically as a response for that from a downstream contact...” (Ex. 16, Deposition of Mr. Landry, p. 228) This manual coordination role assigned by BellSouth to the ACAC/UNE center would be more efficiently performed by an automated OSS system. Therefore it is appropriate to consider the ACAC/UNE function as an excluded OSS function.

Second, BellSouth complains that, in conjunction with the ADSL and HDSL compatible loops, the Commission provided no explanation or description of certain engineering and connection costs eliminated. BellSouth states that neither the job function code nor the activity involved with these costs is discussed. If BellSouth had simply bothered to read the Staff recommendation issued in this case, it would have realized that these “eliminated” costs were WorldCom’s not BellSouth’s. WorldCom offered its proposed work times as an alternative to BellSouth’s, not as a supplement.

On page 112 of the Staff Recommendation, the Staff stated: “Although WorldCom’s work

functions do not exactly parallel BellSouth's, staff includes the work times in the overall category. Staff's recommended work times reflect staff's recommendations concerning methodology, migration, testing, fallout, and the use of forward-looking technologies, and are computed identically to the work times in Issue 1(b)." On page 113, Chart 1 (h) -2, page 114 Chart 1(h) -3, page 120 Chart 1(i) -2 and page 121 Chart 1(I)-3, Staff includes the WorldCom work times for Engineering and for Connection and Testing which WorldCom had recommended be used in lieu of BellSouth's work times. These WorldCom work times were the work times eliminated by the Staff – not BellSouth's work times. If BellSouth wants to adopt WorldCom's work times, then BellSouth's work times should be eliminated completely with the adoption of WorldCom's.

Third, BellSouth complains that the Costs for engineering job function code 31XX were eliminated without explanation or rationale. Again, if BellSouth had bothered to read the Staff's recommendation it would have found the explanation. On page 174 of the Staff's recommendation, Table 1e-3 – note 1, the Staff observed that Engineering 31XX costs were "Recovered in recurring rates by applying Telco Labor Loading Factors (EXH 45)." Since these costs were recovered in the recurring rates it was certainly appropriate to eliminate them from the non-recurring. BellSouth cannot seriously expect the Commission to allow it to double recover on this cost.

CONCLUSION

For the foregoing reasons, the Commission should deny BellSouth's Motion for Reconsideration.

RESPECTFULLY SUBMITTED this 26th day of May, 1998.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or hand delivery(**) this 26th day of May, 1998.

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