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ORIGINAL

June 1, 1998

BY HAND DELIVERY

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 971478-TP, 980184-TP, 980495-TP and 980499-TP

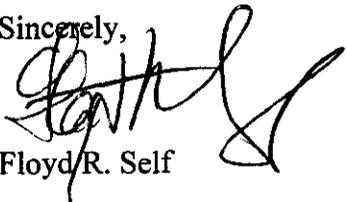
Dear Ms. Bayo:

Enclosed for filing on behalf of WorldCom, Inc. are an original and fifteen copies of a Response in Opposition to GTE Florida Incorporated's Petition for Permission to Submit a Brief in the above-referenced dockets.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

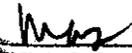
Thank you for your assistance with this filing.

Sincerely,


Floyd R. Self

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____ ERS/amb
EAG _____ Enclosures
LEG *Pellegrini* cc: Mr. Brian Sulmonetti
LIN 5 Parties of Record
OPC _____
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05885 JUN-1 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Complaint of WorldCom Technologies,)
Inc. Against BellSouth Telecommunications, Inc.)
for Breach of Terms of Florida Partial)
Interconnection Agreement under Sections 251)
and 252 of the Telecommunications Act of 1996,)
and Request for Relief.)
_____)

Docket No. 971478-TP

In re: Complaint of Teleport Communications)
Group Inc./TCG South Florida Against BellSouth)
Telecommunications, Inc. For Breach of Terms)
of Interconnection Agreement under Section 252)
of the Telecommunications Act of 1996, and)
Request for Relief.)
_____)

Docket No. 980184-TP

In re: Complaint of Intermedia Communications)
Inc. Against BellSouth Telecommunications, Inc.)
For Breach of Terms of Florida Partial)
Interconnection Agreement under Sections 251 and)
252 of the Telecommunications Act of 1996,)
and Request for Relief.)
_____)

Docket No. 980495-TP

In re: Complaint by MCI Metro Access)
Transmission Services, Inc. Against BellSouth)
Telecommunications, Inc. For Breach of Approved)
Interconnection Agreement by Failure to Pay)
Compensation for Certain Local Traffic.)
_____)

Docket No. 980499-TP
Filed: June 1, 1998

**RESPONSE IN OPPOSITION TO GTE FLORIDA
INCORPORATED'S PETITION FOR PERMISSION TO SUBMIT A BRIEF**

WorldCom, pursuant to 25-22.037, Florida Administrative Code, hereby files its Motion in Opposition to GTE Florida Inc.'s Petition for Permission to Submit a Brief. GTE has not demonstrated any basis for submission of an amicus brief, and WorldCom respectfully requests that the Commission deny GTE's petition. In support thereof, WorldCom states:

1. The Commission, in its order denying GTE's intervention in this proceeding, states: "[a]ll that is presently before us in this proceeding is a responsibility to resolve a contract dispute."

Order No. PSC-98-0476-PCO-TP. The Commission's ultimate decision will resolve the dispute among the parties to the interconnection agreement, and will bind no one else. GTE argues that its intrusion will be limited and no party will be prejudiced by its brief. GTE Petition, p.3. However, in so arguing, it identifies the fundamental reason why it should not participate: "neither GTEFL nor any other entity that has not been granted intervention in these dockets will be officially bound by the decision here." GTE Petition, p.3. In its order denying GTE's intervention in this docket, the Commission relied on its earlier findings that the Telecommunications Act of 1996 (Act) does not contemplate participation by other entities who are not parties to the negotiations and who will not bound to the ultimate interconnection agreement that results. Order No. PSC-98-0476-PCO-TP, *following* Order No. PSC-98-0454-PCO-TP. Thus, under the Act, because GTE is not a party to the negotiations, and thus is not bound by the outcome, it should be denied participation.

2. GTE's petition is simply a reconsideration of the Commission's decision to deny GTE's request to *participate* in this proceeding. GTE tries to distinguish its request for an amicus brief from its earlier petition to intervene; however, the Commission has already answered GTE's request in the negative. In its orders denying intervention, the Commission did not deny only *intervention* by Intermedia, GTE, and Time Warner; it denied them *participation* in this dispute. Order No. PSC-98-0454-PCO-TP; Order No. PSC-98-0476-PCO-TP; Order No. PSC-98-0642-PCO-TP. Each of these orders states that under the Act, only those parties in the contract dispute "may *participate* in this case." Order No. PSC-98-0476-PCO-TP, at p.2 (emphasis added). The earlier denial extends to any type of participation by these groups, even if participation is cloaked as amicus curiae. The Commission correctly denied all "participation" as opposed to mere intervention of other interested persons in this proceeding. If the Commission were to allow GTE to submit an amicus brief, it would open the door to letting all interested persons participate in these types of proceedings, clearly circumventing the Act's intent. Because ample precedent precludes

intervention, interested persons in contractual disputes will simply seek participation as amicus curiae.

3. The slippery slope created by allowing participation by GTE would convert this into the very generic proceeding that the Commission earlier denied as an alternative to intervention. GTE has provided no distinguishing reason why it should be permitted to submit a brief in this proceeding to the exclusion of other interested parties. Thus, if GTE were allowed to submit a brief, the Commission would have difficulty subsequently limiting participation by all other interested persons. GTE's arguments are "not justification to return to the old regulatory routine where all interested persons could participate in matters involving regulated utility providers. Under the Act, the rules of the road are different." Order No. PSC-98-0454-PCO-TP.

WHEREFORE, on the basis of the foregoing, WorldCom respectfully requests that the Commission deny GTE's Petition for Permission to Submit a Brief.

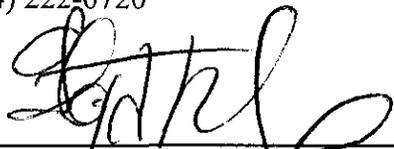
Dated this 1st day of June, 1998.

Respectfully submitted,

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and

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FLOYD R. SELF, ESQ.
NORMAN H. HORTON, JR., ESQ.

Attorneys for WorldCom Technologies, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of WorldCom's Response in Opposition to GTE Florida Incorporated's Petition for Permission to Submit a Brief in Docket Nos. 971478-TP, 980184-TP, 980495-TP and 980499-TP has been furnished by Hand Delivery (*) and/or U.S. Mail to the following parties of record this 1st day of June, 1998:

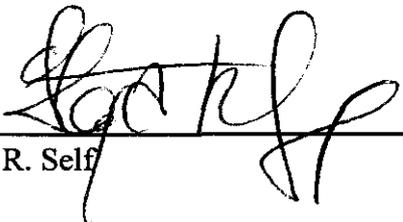
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