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July 13, 1998

RECORDS AND
REPORTING

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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. 980770-TI (AT&T Petition)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Answer and Response to Petition of AT&T Communications of the Southern States, Inc., 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.

Sincerely,

Nancy B. White (ke)

Nancy B. White

RECEIVED & FILED

[Signature]
FPSC BUREAU OF RECORDS

Nusselwhite
NBW/vf

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

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 980770-TI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Federal Express this 13th day of July, 1998 to the following:

Charlie Pellegrini
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Tracy Hatch, Esq.
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301-1549
Tel. No. (850) 224-6384

Nancy B. White (cc)
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of AT&T of the Southern States, Inc. for modification of BellSouth Telecommunications, Inc.'s policies regarding the porting of Direct-In-Dial Numbers) Docket No.: 980770-TI
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) Filed: July 13, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
ANSWER AND RESPONSE TO PETITION
OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.**

BellSouth Telecommunications, Inc., ("BellSouth"), hereby files its Answer and Response, pursuant to Rule 1.110, Florida Rules of Civil Procedure and Rules 25-22.037 and 25-22.0375, Florida Administrative Code, to the Petition of AT&T Communications of the Southern States, Inc. ("AT&T") for Modification of BellSouth's Policies Regarding the Porting of Direct-in-Dial Numbers. AT&T is not entitled to any of the relief it seeks and the Commission should dismiss AT&T's Petition.

For answers to the specific allegations in the Petition, BellSouth states as follows:

1. BellSouth is without information sufficient to formulate a response to Paragraph 1 of the Petition, and, therefore, denies the allegations contained therein.
2. BellSouth admits the allegations of Paragraph 2 of the Petition.
3. BellSouth admits that the Florida Public Service Commission has jurisdiction over the intrastate operations of BellSouth in Florida and denies the remaining allegations of Paragraph 3 of the Petition.
4. BellSouth is without information sufficient to formulate a response to Paragraph 4 of the Petition, and, therefore, denies the allegations contained therein.

5. BellSouth is without information sufficient to formulate a response to Paragraph 5 of the Petition, and, therefore, denies the allegations contained therein.

6. BellSouth is without information sufficient to formulate a response to Paragraph 6 of the Petition, and, therefore, denies the allegations contained therein.

7. BellSouth is without information sufficient to formulate a response to Paragraph 7 of the Petition, and, therefore, denies the allegations contained therein.

8. BellSouth admits the allegations of Paragraph 8 of the Complaint. Further answering, BellSouth avers that its tariff is reasonable, nondiscriminatory, and not anticompetitive. Moreover, BellSouth's DID service is designed in blocks of 20 numbers because the associated operational systems will not accept DID numbers in less than blocks of 20 numbers at the present time.

9. BellSouth is without information sufficient to formulate a response to Paragraph 9 of the Petition, and, therefore, denies the allegations contained therein.

10. BellSouth admits that Section A12.7.1(F) of BellSouth's General Subscriber Services Tariff states that when service of a special type arrangement is requested and provided, rates and charges are based on the costs involved to meet the individual requirements of each case. BellSouth denies the remaining allegations of Paragraph 10 of the Petition.

11. BellSouth admits that BellSouth provided AT&T with a special arrangement agreement containing rates for providing AT&T with less than a full block

of 20 DID numbers. BellSouth denies the remaining allegations of Paragraph 11 of the Petition.

12. BellSouth admits that it provided AT&T with charges for a Georgia request for less than 20 DID numbers and denies the remaining allegations of Paragraph 12 of the Petition.

13. BellSouth is without information sufficient to formulate a response to Paragraph 13 of the Petition, and, therefore, denies the allegations contained therein.

14. BellSouth denies the allegations contained in Paragraph 14 of the Petition and avers that BellSouth's review of Exhibit E indicates AT&T agreed to pay Georgia's charges under protest, not Florida's.

15. BellSouth denies the allegations of Paragraph 15 of the Petition, and avers that BellSouth's special assembly charges are cost-based and appropriate.

16. BellSouth denies the allegations of Paragraph 16 of the Petition, and avers that BellSouth's special assembly charges are cost-based and appropriate.

WHEREFORE, having fully answered, BellSouth respectfully requests that the Petition of AT&T be dismissed and that no relief be granted to AT&T.

Respectfully submitted this 13th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

ROBERT G. BEATTY

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c/o Nancy H. Sims

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