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RECORDS AND
REPORTING

July 20, 1998

ORIGINAL

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. 980800-TP (Supra - Interconnection & Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Answer and Response to Supra Telecommunications and Information Systems, Inc.'s Petition for Emergency Relief, which we ask that you file in the captioned docket.

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 (BW)

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN _____
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- SEC 1 _____
- WAS _____
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cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

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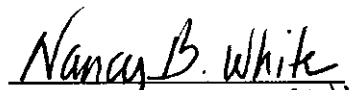
CERTIFICATE OF SERVICE
Docket No. 980800-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by Federal Express this 20th day of July, 1998 to the following:

Legal Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Suzanne Fannon Summerlin, Esq.
Supra Telecommunications and
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1311-B Paul Russell Rd., #201
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Tel. No. (850) 656-2288
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Supra Telecommunications and
Information Systems, Inc.
P.O. Box 144122
Coral Gables, FL 33114-4122
Tel. No. (305) 476-4220
Fax. No. (305) 476-4282


Nancy B. White (PW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of Supra)
Telecommunications and Information)
Systems, Inc., Against BellSouth)
Telecommunications, Inc.)
_____)

Docket No. 980800-TP

ORIGINAL

Filed: July 20, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'s
ANSWER AND RESPONSE TO SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.'s PETITION FOR EMERGENCY RELIEF**

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 for Emergency Relief of Supra Telecommunications and Information Systems, Inc. ("Supra").

Notwithstanding Supra's allegations to the contrary, BellSouth has not violated the Telecommunications Act of 1996 (the "Act") or the provisions of the BellSouth-Supra Interconnection and Collocation Agreements.

For answers to the specific allegations in the Petition, BellSouth states as follows. Because Supra did not number its allegations, BellSouth will answer by paragraph.

1. With regard to the allegations of Paragraph 2 of the Petition, BellSouth states that the provisions of the BellSouth-Supra Collocation Agreement speak for themselves and denies the remaining allegations of Paragraph 2.

2. With regard to the allegations of Paragraph 3 of the Petition, BellSouth states that the provisions of the BellSouth-Supra Collocation Agreement speak for themselves and denies the remaining allegations of Paragraph 3.

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3. With regard to the allegations of Paragraph 4 of the Petition, BellSouth admits that Supra submitted applications of physical collocation at seventeen BellSouth Florida central offices and denies the remaining allegations of Paragraph 4.

4. With regard to the allegations of Paragraph 5 of the Petition, BellSouth admits that Supra submitted applications of physical collocation at seventeen BellSouth Florida central offices. BellSouth admits that many of Supra's applications were deficient and admits that BellSouth does not have sufficient space for physical collocation in the North Dade Golden Glades and West Palm Beach Gardens central offices. Moreover, BellSouth has a problem with sufficient power at the North Dade Golden Glades central office that may cause problems for virtual collocation. BellSouth avers that it shortly will be filing Petitions for Waiver with the Florida Public Service Commission ("Commission") to address these problems. In addition, BellSouth avers that there is no requirement for BellSouth to allow the placement of switch equipment in a virtual collocation situation. BellSouth denies the remaining allegations of Paragraph 5.

5. With regard to the allegations of Paragraph 6 of the Petition, BellSouth states that the provisions of Mr. Cathay's correspondence speak for themselves and denies the remaining allegations of Paragraph 6.

6. With regard to the allegations of Paragraph 7 of the Petition, BellSouth states that it advised Supra that BellSouth's portion of the collocation activity would take

three months from the date of a firm order, assuming ordinary conditions. Moreover, BellSouth advised Supra that this time frame did not include the permitting period required. BellSouth denies the remaining allegations of Paragraph 7. Moreover, BellSouth avers that the Commission, in Order No. PSC-98-0595-PCO-TP, stated that the "purpose of the three month time frame is to serve as a guideline of what we consider reasonable." (Order, p. 6). BellSouth will be prepared to demonstrate why additional time is necessary.

7. With regard to the allegations of Paragraph 8 of the Petition, BellSouth denies the allegations.

8. With regard to the allegations of Paragraph 1, page 4 of the Petition, BellSouth states that the terms of the Act speak for themselves and denies the remaining allegations of Paragraph 1.

9. With regard to the allegations of Paragraph 9 of the Petition, BellSouth states that the terms of the Act speak for themselves and denies the remaining allegations of Paragraph 9.

10. With regard to the allegations of Paragraph 10 of the Petition, BellSouth states that the terms of the Orders of the Federal Communications Commission ("FCC") speak for themselves and denies the remaining allegations of Paragraph 10.

11. With regard to the allegations of Paragraph 11 of the Petition, BellSouth states that the terms of the Orders and Regulations of the FCC speak for themselves and denies the remaining allegations of Paragraph 11.

12. With regard to the allegations of Paragraph 12 of the Petition, BellSouth denies the allegations contained in the Paragraph. Moreover, as stated above, BellSouth intends to file Petitions for Waiver on the central offices involved in the near future and will attach detailed floor plans. Moreover, it is BellSouth's understanding that a physical walk-through will be conducted on July 24, 1998. At that time, floor plans will be provided. BellSouth must limit the group involved to three Staff representatives and three Supra representatives for safety and security reasons.

13. With regard to the allegations of Paragraph 13 of the Petition, BellSouth denies these allegations.

14. With regard to the allegations of Paragraph 14 of the Petition, BellSouth states that the terms of the Act speak for themselves and denies the remaining allegations of Paragraph 14.

15. With regard to the allegations of Paragraph 15 of the Petition, BellSouth denies the allegations and avers that BellSouth is not placing "roadblocks" in Supra's way, but merely stating the facts.

16. With regard to the allegations of Paragraph II, page 8 of the Petition, BellSouth denies the allegations therein and avers that a walk-through has been arranged.

17. With regard to the allegations of Paragraph 16 of the Petition, BellSouth denies that allegations therein.

18. With regard to the allegations of Paragraph 17 of the Petition, BellSouth avers that a walk-through has been arranged and denies the remaining allegations of Paragraph 17.


WHEREFORE, having fully answered the allegations raised in the Petition, BellSouth respectfully requests that the Petition of Supra be dismissed as Supra is not entitled to the relief sought.

Respectfully submitted this 20th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.


ROBERT G. BEATTY

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