

E. EARL EDENFIELD, Jr.
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BellSouth Telecommunications, Inc.
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RECORDS AND REPORTING

March 30, 2000 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. 991947-TP (Florida Telephone Services Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of the Pre-hearing Statement of BellSouth Telecommunications, Inc. We ask that you file this item 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,

E. Earl Edenfield Jr.

E. Earl Edenfield, Jr. (PWW)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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Exhibits

1. Daonne D. Caldwell (DDC-1) OSS Cost Studies

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

Statement of Basic Position

The issue in this docket represents a specific dispute between BellSouth and Florida Telephone Services, LLC ("FTS") as to what should be included in the Interconnection Agreement between the parties. BellSouth's position is more consistent with the 1996 Act, the pertinent rulings of the FCC and the rules of this Commission. Therefore, the Commission should sustain BellSouth's position.

BellSouth's Position on the Issues of Law and Fact

Issue 1: What are the appropriate rates to be charged by BellSouth for Florida Telephone Services' access to and use of the electronic and manual interfaces to BellSouth's OSS and functions?

Position: The 1996 Act and the FCC's rules allow BellSouth to recover costs associated with developing, providing, and maintaining the electronic and manual interfaces to allow ALECs, such as FTS, to access BellSouth's OSS. Although the Florida Public Service Commission has not decided the issue, eight state commissions in BellSouth's region have recognized BellSouth's right to recover such costs. BellSouth is proposing rates for electronic and manual access calculated consistent with the cost methodology previously adopted by the Commission.

Stipulations

None

Pending Motions

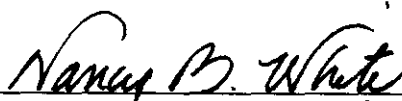
None.

Other Requirements

None.

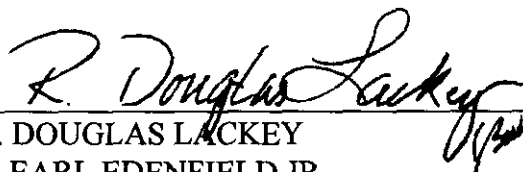
Respectfully submitted this 30th day of March 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
MICHAEL P. GOGGIN

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**CERTIFICATE OF SERVICE
DOCKET NO. 991947-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 30th day of March 2000 on the following:

Beth Keating
Staff Counsel
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