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RECORDS AND
REPORTING

May 15, 2000

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

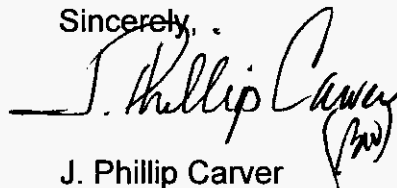
Re: Docket No. 991220-TP (Global NAPs)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of the Prehearing Statement of BellSouth Telecommunications, Inc., which we ask that you file in the above-referenced 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,



J. Phillip Carver

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

- AFA _____
- APP _____
- CAF _____
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**CERTIFICATE OF SERVICE
Docket No. 991220-TP**

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


U.S. Mail this 15th day of May, 2000 to the following:

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J. Phillip Carver (ps)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)	
Petition of GLOBAL NAPs SOUTH, INC.,)	
for Arbitration of Interconnection Rates,)	Docket No. 991220-TP
Terms, and Conditions and Related Relief)	
of Proposed Agreement with BellSouth under)	
the Telecommunications Act of 1996)	

PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order On Joint Motion To Modify Schedule and Approving Tentative List of Issues (Order No. PSC-00-0294-PCO-TP), issued February 14, 2000, hereby submits its Prehearing Statement for the above-styled matter.

A. Witnesses

BellSouth proposes to call the following witnesses to offer testimony on the issues in this docket:

<u>Witness</u>	<u>Issue(s)</u>
1. Alphonso J. Varner (Direct and Rebuttal)	All

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on May 25, 2000. BellSouth has listed the witness for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

DOCUMENT NUMBER-DATE

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B. Exhibits

Alphonso J. Varner	AJV-1	Standard Agreement
	AJV-2	Reciprocal Compensation Diagram
	AJV-3	Access Service for IXC-Bound and ISP-Bound Traffic
	AJV-4	Single Network and Multi-Network Provision of Access Service
	AJV-5	Diagram Representing Global NAPs position
	AJV-6	BellSouth's Proposed Interim Plan
	AJV-7	Calculation of Sharing Percentage
	AJV-8	1997 DeltaCom Agreement Rates And Current FPSC Approved Rates

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" 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.

C. Statement of Basic Position

Many of the issues in this case involve the treatment of ISP traffic. This traffic is not local traffic, and should not be subject to the reciprocal compensation provisions in an Interconnection Agreement that apply to local traffic. Further, this Commission need not take any action to develop a compensation mechanism for this traffic; the FCC currently has a rulemaking under way for this purpose. If this Commission wishes to take some action prior to the conclusion of the FCC Rulemaking, this Commission should direct the parties to implement a bill and keep mechanism while awaiting a decision by the FCC.

Each of the remaining individually numbered issues in this docket represent a dispute between BellSouth and Global NAPs as to whether the Interconnection Agreement between the parties should be BellSouth's current Standard Agreement or the Agreement that BellSouth entered into with DeltaCom in 1997. BellSouth's Standard Agreement is more consistent with the Act, the pertinent rulings of the FCC, this Commission's previous orders, and the appropriate current practices in the various subject areas covered by the Agreement. Therefore, each of BellSouth's positions should be sustained by the Commission.

D. BellSouth's Position on the Issues

Issue 1: When a new entrant opts into a pre-existing interconnection agreement between an incumbent and another carrier, when does that agreement expire?

Position: This issue has been resolved by the Commission in Order No. PSC-00-0568-FOF-TP.

Issue 2: Should dial-up access to the internet through an ISP (or “ISP-bound traffic”) be defined as “local traffic” for purposes of the new Global NAPs/BellSouth Interconnection Agreement?

Position: Dial-up connections to an ISP (“ISP-bound traffic”) should not be treated as local traffic for purposes of reciprocal compensation. Instead, local traffic should be defined in the manner described below in response to Issue 5.

Issue 3: Should ISP-bound traffic be included in the reciprocal compensation arrangements of the new Interconnection Agreement?

Position: Since ISP-bound traffic is access traffic, not local traffic, it is not subject to the reciprocal compensation obligations contained in Section 251 of the Act, and should not be compensated in the Agreement. However, if the Commission does order that the Agreement address compensation for ISP traffic, it should direct the parties to implement a bill-and-keep arrangement as the inter-carrier compensation mechanism for ISP-bound traffic until such time as the FCC’s rulemaking on inter-carrier compensation is completed.

Issue 4: What are the appropriate reciprocal compensation rates to be included in the new Global NAPs/BellSouth Interconnection Agreement?

Position: The appropriate rates for reciprocal compensation of local, non-ISP traffic, are the Commission-approved elemental rates for reciprocal compensation, specifically the rates for end office termination, tandem switching and common transport.

Issue 5: What is the appropriate definition of local traffic to be included in the Interconnection Agreement?

Position: Local traffic should be defined as any telephone call that originates in one exchange and terminates in either the same exchange, or other local calling area associated with the originating exchange as defined and specified in Section A3 of BellSouth's General Subscriber Service Tariff. Local traffic should not include traffic that originates from or is directed to or through an enhanced service provider or information service provider.

Issue 6: What are the appropriate UNE rates to be included in the Interconnection Agreement?

Position: The appropriate UNE rates to be included in the Interconnection Agreement are those set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1.

Issue 7: What are the appropriate collocation provisions to be included in the Interconnection Agreement?

Position: The appropriate collocation provisions are those set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. The Standard Agreement provides a current, detailed collocation offering that is consistent with the FCC's Order on collocation. The DeltaCom Agreement does not reflect the FCC's recent Order.

Issue 8: What is the appropriate language concerning order processing to be included in the Interconnection Agreement?

Position: The appropriate language concerning order processing is the language set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. The proposed Standard Agreement is consistent with the

FCC's 319 UNE Remand Order. The DeltaCom Agreement is not consistent with this Order of the FCC.

Issue 9: What is the appropriate language relating to conversion of exchange service to network elements to be included in the Interconnection Agreement?

Position: The appropriate language concerning conversion of exchange service to network elements is the language set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. The Standard Agreement provides a wider array of choices to ALECs than does the DeltaCom Agreement, and it reflects changes made as a result of BellSouth's experience over the past two years with ordering and provisioning.

Issue 10: What are the appropriate service quality measurements to be included in the Interconnection Agreement?

Position: The appropriate language concerning service quality measurements is set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. Global NAPs has requested the DeltaCom Agreement, which has no service quality measurements. If Global NAPs does not desire these provisions, then this is acceptable to BellSouth. However, to the extent the Interconnection Agreement includes service quality measurements, these measurements should be those set forth in the Standard Agreement.

Issue 11: What is the appropriate language relating to network information exchange to be included in the Interconnection Agreement?

Position: The appropriate language concerning network information exchange is set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. The Standard Agreement reflects operational changes

and improvements that have occurred since the DeltaCom Agreement was signed in 1997.

Issue 12: What is the appropriate language relating to maintenance and trouble resolution to be included in the Interconnection Agreement?

Position: The appropriate language concerning maintenance and trouble resolution is set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. The Standard Agreement contains extensive and specific language pertaining to maintenance and trouble resolution that reflects operational changes that have occurred since the DeltaCom Agreement was signed in 1997.

Issue 13: What is the appropriate language relating to local traffic exchange to be included in the Interconnection Agreement?

Position: The appropriate language concerning local traffic exchange is set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. The Standard Agreement more clearly defines the terms and compensation for local traffic exchange than does the DeltaCom Agreement.

Issue 14: What is the appropriate language relating to telephone number portability arrangements to be included in the Interconnection Agreement?

Position: The appropriate language concerning telephone number portability arrangements is set forth in the Standard Agreement attached to the testimony of BellSouth's witness, Alphonso J. Varner, as AJV-1. The Standard Agreement more accurately reflects the current status of the provisioning of local number portability.

E. Stipulations

None.

F. Pending Motions


BellSouth has no motions pending at this time.

G. Other Requirements


None.

Respectfully submitted this 15th day of May, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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