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RECORDS AND
REPORTING

May 19, 2000

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

Re: Docket No. 990649-TP (UNE Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Motion for Extension of Time to File Testimony 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,

Bennett L. Ross
Bennett L. Ross
(28)

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

- AFA _____
- APP _____
- CAF _____
- CMW _____
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- EAG _____
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**CERTIFICATE OF SERVICE
Docket No. 990649-TP**

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

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Nancy B. White (2)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation Into)
Pricing of Unbundled Network)
Elements)
_____)

Docket No. 990649-TP

Filed May 19, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE TO MOTION FOR EXTENSION OF
TIME TO FILE TESTIMONY

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits this response to the Motion filed by AT&T Communications of the Southern States, Inc. ("AT&T"), MCI WorldCom, Inc. ("MCI WorldCom"), and the Florida Competitive Carriers Association ("FCCA") (collectively "Movants"), seeking an extension of time for the filing of testimony in this proceeding. While BellSouth does not oppose an extension, BellSouth files this response to set the record straight concerning two matters raised in the Movants' Motion.

First, while BellSouth indicated its willingness to discuss extending the deadline for the ALECs to file testimony (with a corresponding extension in the deadline for the incumbents to file rebuttal testimony), BellSouth made clear to counsel for the Movants that such an extension should only apply to testimony addressing BellSouth's cost models. To the extent that the Movants intend to introduce their own cost models, such as the Hatfield Model, the Movants should be required to comply with the June 1, 2000 testimony deadline. The proported reason for seeking an extension -- the need for "adequate time to properly analyze BellSouth's vast new cost model" -- does not justify extending the deadline for the Movants filing cost studies of their own.

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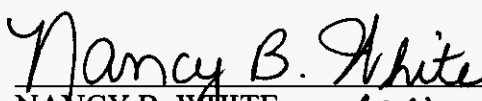
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Thus, BellSouth does not object to the ALECs having until June 15, 2000 to file testimony responding to the incumbents' cost models, provided that the June 1, 2000 deadline is maintained for the ALECs to file testimony introducing or supporting their own cost models, if any. The incumbents should only have to file rebuttal testimony one time, and BellSouth is amenable to the June 29, 2000 date proposed by the Movants.

Second, BellSouth seeks to clarify its offer to allow experts for the parties to contact BellSouth's experts directly about BellSouth's new cost models. BellSouth made this offer in order to facilitate an understanding of how BellSouth's new cost models work, particularly in light of the difficulty experienced by some parties in loading and operating the models. BellSouth's offer was never intended to be a substitute for discovery or to impose a burden on BellSouth, and BellSouth has written a letter to counsel for the parties clarifying the scope of this arrangement. A copy of this letter is attached.

For the foregoing reasons, BellSouth does not oppose the Movants' motion as modified above.

BELLSOUTH TELECOMMUNICATIONS, INC.



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May 18, 2000

Counsel of Record:

Re: *In re: Investigation Into Pricing of Unbundled Network Elements*
Docket 990649-TP

At the technical workshop on May 15, 2000, BellSouth agreed that subject matter experts for the parties could contact BellSouth's subject matter experts directly if they had any problems operating or understanding how to work BellSouth's new cost models. BellSouth made this offer because of some problems experienced by certain parties in loading and operating BellSouth's cost models. This offer was not intended to be a substitute for discovery or to be a burden on BellSouth.

In the future, any questions by your subject matter experts about BellSouth's cost models should be directed to Bob McKnight at BellSouth. Mr. McKnight's phone number is (205) 977-2095. Again, BellSouth respectfully requests this arrangement not be abused, particularly since BellSouth's subject matter experts are devoting much of their time responding to the voluminous data requests that have been served on BellSouth in this proceeding.

Please let me know if you have questions or if I can provide any additional information.

Yours very truly


Bennett L. Ross

cc: Nancy White, Esquire
E. E. Edenfield, Esquire
T. Michael Twomey, Esquire

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ATTACHMENT 1