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Legal Department

MICHAEL P. GOGGIN  
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BellSouth Telecommunications, Inc.  
150 South Monroe Street  
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Tallahassee, Florida 32301  
(305) 347-5561

RECORDS AND  
REPORTING

August 16, 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. 991946-TP (ITC^DeltaCom Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to ITC^DeltaCom Communications, Inc.'s Motion for Leave to File Supplemental Authority, 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,

*Michael P. Goggin*  
Michael P. Goggin

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

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
DOCKET NO. 991946-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
U.S. Mail this 16th day of August, 2000 to the following:

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

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ITC^DeltaCom  
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Huey, Guilday & Tucker, P.A.  
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Suite 900 (32301)  
P.O. Box 1794  
Tallahassee, FL 32302  
Tel. No. (850) 224-7091  
Fax. No. (850) 222-2593  
Represents ITC^DeltaCom

Floyd R. Self  
Messer, Caparello & Self, P.A.  
215 South Monroe Street, Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
fself@lawfla.com  
Tel. No. (850) 222-0720

  
Michael P. Goggin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:	)	Docket No. 991946-TP
	)	
Complaint of ITC^DeltaCom	)	
Communications, Inc. Against BellSouth	)	
Telecommunications, Inc. for Breach of	)	
Interconnection Terms, and Request for	)	
Immediate Relief	)	
<hr/>		Filed: August 16, 2000

**RESPONSE OF BELLSOUTH TELECOMMUNICATIONS, INC. TO  
ITC^DELTACOM COMMUNICATIONS, INC.'s MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL AUTHORITY**

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to ITC^DeltaCom Communications, Inc.'s ("DeltaCom") Motion for Leave to File Supplemental Authority ("Motion").

1. On August 9, 2000, DeltaCom filed a motion for leave to file supplemental authority. Attached to its August 9 motion is an order issued by the North Carolina Utilities Commission ("NCUC") granting DeltaCom's Motion for Judgment in that state.


2. BellSouth has no objection to permitting DeltaCom to submit the NCUC's Order to the Commission. BellSouth notes, however, that this Commission's decision must be based on the law and the evidence presented by the parties in this matter. This Commission's determination of the issues is not controlled by orders issued by another state commission in a similar case.

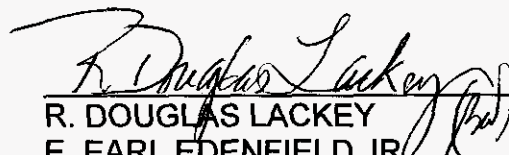
3. In the interests of fairness and completeness, BellSouth also requests leave to submit the attached order of the NCUC, dated August 10, 2000, staying the prior order that is the subject of DeltaCom's Motion.

For all of the foregoing reasons, BellSouth objects to DeltaCom's implied assertion that the NCUC Order should be considered "authority," but BellSouth does not otherwise object to DeltaCom's Motion.

Respectfully submitted this 16th day of August, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE (M)  
MICHAEL P. GOGGIN  
c/o Nancy Sims  
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\_\_\_\_\_  
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