

ORIGINAL

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of)
)
Petition of BellSouth Telecommunications, Inc.)
For a Section 252(b) Arbitration of)
Interconnection Agreement with Intermedia)
Communications Inc.)

Docket No. 991854-TP
Filed: September 6, 2000

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RECORDS AND
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INTERMEDIA COMMUNICATIONS INC.'S
REQUEST FOR ORAL ARGUMENT

COMES NOW, INTERMEDIA COMMUNICATIONS INC. ("Intermedia"), through counsel, and files this Request for Oral Argument on its September 6, 2000 Motion for Reconsideration and Clarification of the Commission's Order No. PSC-00-1519-FOF-TP issued on August 22, 2000 in the above-captioned proceeding ("FPSC Order"). In support thereof, Intermedia states as follows:

REQUEST FOR ORAL ARGUMENT

Pursuant to Rule 25-22.060(1)(f), Florida Administrative Code, oral argument is requested on this Motion for Reconsideration and Clarification. Oral argument on this Motion is warranted because it is necessary to the Commission's comprehension and evaluation of the following very complex matters associated with this Motion:

- APP
- CAF
- CMP
- COM
- CTR
- ECR
- LEG
- OPC
- PAI
- RGO
- SEC
- SER
- OTH

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- (i) the unsettled state of the law in Florida and elsewhere concerning the proper application of 47 C.F.R. Section 51.711(a)(3);
- (ii) the exclusive federal jurisdiction over, and regulatory classification of, Internet Protocol Telephony/VOIP as an enhanced service;
- (iii) the relationship between BellSouth's tariffed Foreign Exchange Service offering to the unilaterally restrictive language that BellSouth seeks to impose on Intermedia;
- (iv) the practical and legal implications of the Commission's determination that both Parties should, on an interim basis, assign numbers only within "the areas to which they are traditionally associated; and
- (v) the spill-over competitive importance of those issues not only to Intermedia but also to all competitive and incumbent carriers operating in the State of Florida.

Oral argument on Intermedia's Motion is also warranted so that the Commission may have the opportunity to question the Parties directly in the manner of an appellate court, which in this case would unquestionably be useful in making the necessary legal and policy determinations. This is *especially* important in light of the new evidence that has been revealed with respect to BellSouth's treatment of the Switched Access Traffic/VOIP issue in its agreement with e.spire, as contrasted with its comparably discriminatory and anticompetitive treatment of that issue in its dealings with Intermedia. The Commission may well wish to ask BellSouth why it availed itself of the administrative process to fight Intermedia on an issue it knew that it had already compromised elsewhere without even attempting to settle the issue with Intermedia.

Filed this 6th day of September, 2000.

Respectfully submitted,

INTERMEDIA COMMUNICATIONS INC.

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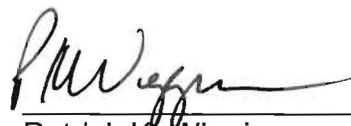
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Hand Delivery or by Federal Express overnight delivery(*) this 6th day of September, 2000 to the following:

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