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December 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. 000075-TP (Investigation into Appropriate Methods to Compensate Carriers for Exchange of Traffic Subject to Section 251 of the Telecommunications Act of 1996)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of the Joint Response of Verizon Florida, Inc., BellSouth Telecommunications, Inc., and Sprint-Florida Incorporated to Joint Motion to Bifurcate, Extend Filing Dates and Request for Issues Identification Status Conference, 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,

Nancy B. White
Nancy B. White

cc: All Parties of Record
Caldwell Marshall M. Criser III
R. Douglas Lackey

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**CERTIFICATE OF SERVICE
Docket No. 000075-TP**

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

Federal Express this 15th day of December, 2000 to the following:

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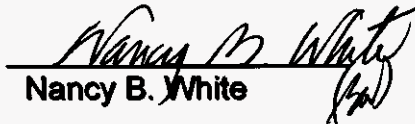
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate methods)	Docket No. 000075-TP
to compensate carriers for exchange of)	
traffic subject to Section 251 of the)	
Telecommunications Act of 1996)	Filed: December 15, 2000
)	

**JOINT RESPONSE OF VERIZON FLORIDA INC.,
 BELLSOUTH TELECOMMUNICATIONS, INC. AND SPRINT-FLORIDA
 INCORPORATED TO JOINT MOTION TO BIFURCATE, EXTEND FILING DATES
 AND REQUEST FOR ISSUES IDENTIFICATION STATUS CONFERENCE**

On December 12, 2000, the Florida Competitive Carriers Association, AT&T Communications of the Southern States, Inc., Intermedia Communications, Inc., WorldCom, Inc., XO Communications, Time Warner, e.spire, and the Florida Cable Telecommunications Association (Joint Movants) filed a Joint Motion that was prompted by the Commission's inclusion of additional issues in this docket, as reflected in the supplemental procedural order issued on December 7, 2000. The Joint Movants have asked the Commission to incorporate new issues 13 and 14 into this proceeding, but to bifurcate the proceeding and address the remaining, additional issues in a separate evidentiary hearing. In addition, the Joint Movants have asked the Commission to modify the filing dates for testimony and to convene an issue identification/status conference meeting to discuss the issues and scheduling for this docket. Verizon Florida Inc. (Verizon), BellSouth Telecommunications, Inc. (BellSouth) and Sprint Communications Company Limited Partnership and Sprint-Florida Incorporated (collectively "Sprint") (Joint Respondents) hereby respond to the Joint Movants' filing.

The Joint Respondents agree with the Joint Movants that bifurcation is necessary to allow the Commission and the parties to consider the additional issues in a careful and thorough manner. Like the Joint Movants, the Joint Respondents believe that the existing procedural schedule will not permit thoughtful and comprehensive testimony on these new issues. However, the Joint Respondents would extend the Joint Movants' logic to all of the additional issues. That is, the Joint Respondents ask the Commission to address all of the new issues in a separate evidentiary proceeding, including issues 13 and 14. The Joint Respondents disagree with the Joint Movants' contention that

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issues 13 and 14 are more closely related to the originally identified issues than some other of the new issues.¹ Moreover, the parties themselves considered the appropriate scope of the docket and specifically did not ask for these issues to be included in this proceeding when the original issues list was devised, so none would be prejudiced by assigning all of the additional issues to a separate proceeding.

The supplemental procedural order sets January 10, 2001, as the date for rebuttal testimony and exhibits on "prior issues." The Joint Movants ask for all rebuttal testimony to be moved to February 6, 2001. The Joint Respondents do not oppose the Joint Movants' proposed filing date for rebuttal testimony. Indeed, the proposed date may obviate the need for an additional round of testimony which would likely otherwise be necessary, assuming the FCC releases its reciprocal compensation order before the end of this year, as scheduled.

Finally, the Joint Respondents agree with the Joint Movants that an issue identification conference is warranted to allow the parties to discuss the wording of the new issues. Because the Joint Respondents have asked the Commission to move all additional issues to a separate proceeding, scheduling of this issues identification conference is not as urgent as it would be if any or all of the new issues are included in this phase of the proceeding.

For all the reasons discussed here, the Joint Respondents respectfully request that the Prehearing Officer bifurcate all of the additional issues for hearing in a separate proceeding; move the rebuttal testimony date on the existing issues to February 6; and schedule an issues identification conference to allow the parties to discuss and possibly refine the additional issues that have been identified.

¹ With regard to the nature of the issues, the Joint Respondents would point out that issue 16, concerning Internet protocol (IP) telephony, has very little to do with any of the other issues in the docket, either the original or additional ones, and raises complex considerations. If the Commission wishes to address IP telephony, the Joint Respondents suggest that the best approach would be to do so in a docket of its own, after the hearings on the other issues.

Respectfully submitted on December 15, 2000.



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