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February 12, 2001

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

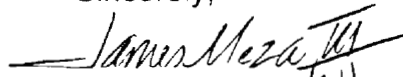
Re: Docket No. 010030-TX (Verizon)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Comments to Verizon Select Services, Inc.'s Petition for Limited Waiver of Rule 25-4.118 of the Florida Administrative Code, 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,


James Meza III (fw)

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

DOCUMENT NUMBER-DATE

01999 FEB 12 06

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 010030-TX**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 12th day of February, 2001 to the following:

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

Administrative Procedures Committee
Room 120 Holland Building
Tallahassee, FL 32399-1300

Verizon Florida, Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Tel. No. (813) 483-2617
Fax. No. (813) 223-4888


James Meza III (su)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Verizon Select)	Docket No 010030-TX
Services Inc. for Limited Waiver of)	
Rule 25-4.118, F.A.C)	Filed: February 12, 2001
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**BELLSOUTH'S COMMENTS TO VERIZON'S PETITION FOR LIMITED
WAIVER OF RULE 25-4.118 OF THE FLORIDA ADMINISTRATIVE CODE**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-104.003, Florida Administrative Code and §120.542(6), Florida Statutes, hereby files comments to Verizon Select Services, Inc.'s and Verizon Florida, Inc.'s ("collectively Verizon") Petition for Limited Waiver of Rule 25-4.118 of the Florida Administrative Code.

1. In Verizon's Petition for Limited Waiver of Rule 25-4.118 of the Florida Administrative Code, Verizon requests, among other things, that this Commission order BellSouth and Sprint to accept all of Verizon's former customers that fail to select another local service once Verizon exits the local service provider industry on or about February 26, 2001 for out-of-franchise customers.

2. BellSouth has the following concerns about Verizon's requested order:

a. First, the natural result of competition is that some businesses will fail or decide to exit the industry. Directing BellSouth to be the default carrier every time an ALEC exits the industry frustrates the competitive spirit and forces BellSouth to be a pseudo-parent to all ALECS, which is contrary to the purposes of

the Telecommunications Act of 1996. As with any other business, when an ALEC exits the industry, the responsibility for ensuring continuation of service should lie with the ALEC and its customers, not BellSouth.

b. Second, BellSouth could be forced to accept all of Verizon's former customers, regardless of their credit risk. Although Verizon requests that BellSouth be directed to take Verizon's customers subject to BellSouth's credit policies, Verizon admits that it does not know which of its customers fail to meet BellSouth's credit policies. Further, such an order is almost impossible to implement because the customers defaulting to BellSouth are those that failed to respond to several letters sent by Verizon informing them to select a new service provider. Consequently, BellSouth has no means of collecting a deposit from these customers or to obtain their approval for a credit check to determine if said customers satisfy BellSouth's credit policies. Indeed, Verizon recognizes the problems associated with this order because it requests that BellSouth be directed to take all customers, subject to the right of termination after initiating service.

BellSouth understands that Verizon has agreed to provide BellSouth with a spreadsheet containing information relating to its customers, which purportedly will allow BellSouth to contact these customers and determine if they satisfy BellSouth's credit policies.

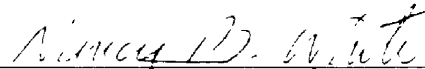
However, due to Verizon's request to exit the industry by February 2001 and for expedited consideration of its waiver request, it is unlikely that BellSouth could accomplish this task by the proposed exit date. Further, section 364.24, Florida Statutes, may prohibit Verizon from providing BellSouth with the above-mentioned customer information. This statute prohibits telecommunications companies from intentionally disclosing customer account records, subject to certain exceptions. In any event, BellSouth should not be obligated to utilize its efforts and resources in calling these silent customers or to take customers subject to the right to terminate at a later date and with proper notice, simply because Verizon unilaterally decided to exit the industry.

3. While the proposed waiver and order is not satisfactory, BellSouth is willing to work with Verizon and the Commission to perfect a solution to the problems associated with Verizon's unilateral decision to stop providing basic local service. BellSouth does not object to accepting new customers who independently chose BellSouth to be its carrier, but BellSouth does not want to be forced to accept all customers of a soon-to-be defunct ALEC, especially those that would not normally be able to receive service.

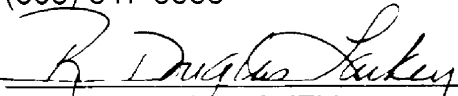
4. For these reasons, BellSouth requests that this Commission deny Verizon's request for a limited waiver of Rule 25-4.118 of the Florida Administrative Code.

Respectfully submitted this 12th day of February, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC



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