BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by AT&T Communications of the) Southern States, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. pursuant to 47 U.S.C. Section 252.

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Docket No. 000731-TP

Filed: 3/26/01

AT&T'S MOTION TO CLARIFY POSITION AND SUPPLEMENT POST-HEARING BRIEF

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AT&T Communications of the Southern States, Inc. ("AT&T"), by and through

its undersigned counsel, hereby moves the Commission to supplement the hearing record in this docket and clarify its position with regard to Issue 34. For cause, AT&T shows as follows:

On March 14, 2001, AT&T filed its Post-Hearing Statement of Issues and

Positions and Post-Hearing Brief. It has come to AT&T's attention that a position

statement for Issue No. 34 was inadvertently omitted from the brief. AT&T's position, as

stated in the prehearing order in this docket, is as follows:

Issue No. 34: What are the appropriate rates and charges for unbundled network elements and combinations of network elements?

AT&T's position: Except for line sharing rates, this issue has been deferred pending the outcome of Docket No. 990649-TP.

To clarify, AT&T does not object to the rates proposed by BellSouth for line sharing, and argues its position on the policy of line sharing and line splitting in connection with Issue No. 33. Because AT&T does not object to the rates proposed by BellSouth, it has presented no evidence in this docket with regard to Issue No. 34, and did not brief the issue.

> DOCUMENT NUMBER-DATE 03819 MAR 26 5 FESS -RECORDS HEPORTING

In order to ensure that the record is complete and accurate regarding its positions, AT&T respectfully requests the Commission to supplement AT&T's post-hearing brief with this information.

Respectfully submitted this $\mathcal{L}_{\ell}^{\top \ell \ell}$ day of March, 2001.

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Attorney for AT&T Communications of the Southern States, Inc.

CERTIFICATE OF SERVICE Docket No. 000731-TP

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

via hand delivery to the following parties of record on this 26th of March, 2001.

Nancy B. White c/o Nancy Sims BellSouth Telecommunications, Inc. 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301-1556

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