NANCY B. WHITE General Counsel-Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

March 30, 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. 001097-TP

Complaint of BellSouth against Supra

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of Prehearing Statement of BellSouth Telecommunications, Inc., which we ask that you file in the above-referenced matter.

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 (LA

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

CERTIFICATE OF SERVICE Docket No. 001097-TP

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

served via U. S. Mail this 30th day of March, 2001 to the following:

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

Brian Chaiken
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, Florida 33133
Tel. No. (305) 443-3710
Fax. No. (305) 443-9516

rano, by

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of BellSouth)	
Telecommunications, Inc. against Supra)	Docket No. 001097-TP
Telecommunications and Information)	
Systems, Inc., for Resolution of Billing)	Filed: March 30, 2001
Disputes.)	
)	

PREHEARING STATEMENT OF BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-01-0388-PCO-TP), issued February 15, 2001, and the Order Granting In Part and Denying In Part Supra's Motion to Reschedule Hearing Date (Order No. PSC-01-0699-PCO-TP) issued March 20, 2001, hereby submits its Prehearing Statement for the above captioned matter.

A. Witnesses

BellSouth proposes to call the following witnesses to offer testimony on the issues in this docket:

Witness	Issue(s)
Patrick C. Finlen (Direct and Rebuttal)	All
Claude P. Morton (Direct)	1

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be

designated by the Prehearing Officer at the prehearing conference to be held on April 6, 2000. BellSouth has listed the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

	B. Exhibits	
Patrick C. Finlen	PCF-1	BellSouth/Supra Resale Agreement - 6/1/97
	PCF-2	Letter from Reinke to Beck - 10/20/97
	PCF-3	Letter from Fields to Ramos - 10/20/97
	PCF-4	E-mail from Finlen to Ramos
	PCF-5	Letter from Finlen to Ramos - 10/23/97
	PCF-6	Attachment 2 - 10/15/97
	PCF-7	Order No. PSC-99-1092- FOF-TP
	PCF-8	Tariff FCC No. 1 Sections 4.5 - 4.6
	PCF-9	47 CFR 51-617
	PCF-10	Letter from Bentley to Fleming - 3/11/00
	PCF-11	Letter from Smith to Bentley - 3/30/00
	PCF-12	Letter from Bentley to Finlen - 4/10/00

	PCF-13	Letter from Finlen to Bentley - 4/28/00
	PCF -14	Order No. PSC-98-0279- PCO-TX
	PCF-15	Section A4, GSST
	PCF-16	Order No. PSC-98-1001- FOF-TP
Claude P. Morton	CPM-1	BellSouth Master Account Application
	CPM-2	Billing Portion of Supra Order

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

BellSouth has appropriately and properly billed Supra for End-User Common Line Charges, secondary service charges and for changes in service, unauthorized local service changes, and reconnections under the 1997 resale agreement between BellSouth and Supra.

D. BellSouth's Position on the Issues

Issue 1: Should the rates and charges contained (or not contained) in the 1997 AT&T/BellSouth Agreement apply to the BellSouth bills at issue in this Docket?

Position: No. The 1997 AT&T/BellSouth agreement is not applicable to the BellSouth bills at issue in this docket. The 1997 BellSouth/Supra resale agreement governs the BellSouth bills at issue in this docket.

<u>Issue 2</u>: Did BellSouth bill Supra appropriately for End-User Common Line Charges pursuant to the BellSouth/Supra interconnection and resale agreements?

<u>Position</u>: Yes. BellSouth billed Supra appropriately for End-User Common Line Charges pursuant to Section VII (L) of the BellSouth/Supra resale agreement, FCC Tariffs, and FCC rules.

<u>Issue 3</u>: Did BellSouth bill Supra appropriately for changes in services, unauthorized local services and reconnections pursuant to the BellSouth/Supra interconnection and resale agreements?

<u>Position</u>: Yes. BellSouth billed Supra appropriately pursuant to Section VI (F) of the BellSouth Supra resale agreement.

<u>Issue 4</u>: Did BellSouth bill Supra appropriately for secondary service charges pursuant to the BellSouth Supra interconnection and resale agreements?

Position: Yes. BellSouth billed Supra appropriately pursuant to BellSouth's tariffs and Section IV (3) of the BellSouth/Supra resale agreement.

E. Stipulations

None.

F. Pending Motions

BellSouth has no motions pending at this time.

G. Other Requirements

None.

Respectfully submitted this 30th day of March, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

c/o Nancy Sims

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