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April 17, 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. 010345-TP (Structural Separation of BellSouth)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion to Dismiss, or in the Alternative, Motion to Strike Florida Competitive Carriers Association's Request for Commission Investigation Concerning the Use of Structural Incentives to Open Local Telecommunications Markets in Support of AT&T Petition to Initiate Proceeding, 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,

*Patrick W. Turner*  
Patrick W. Turner (KA)

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

DOCUMENT NUMBER-DATE  
04737 APR 17 01  
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 010345-TP**

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

U.S. Mail this 17th day of April, 2001 to the following:

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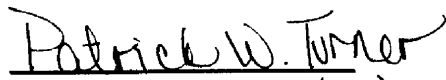
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Patrick W. Turner  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition of AT&T Communications of the Southern	)	Docket No. 010345-TP
States, Inc., TCG South Florida, and MediaOne	)	
Florida Telecommunications, Inc. for Structural	)	
Separation of BellSouth Telecommunications, Inc.	)	Filed: April 17, 2001
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
MOTION TO DISMISS OR IN THE ALTERNATIVE MOTION TO STRIKE,  
FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S  
REQUEST FOR COMMISSION INVESTIGATION CONCERNING THE USE OF  
STRUCTURAL INCENTIVES TO OPEN LOCAL TELECOMMUNICAITONS  
MARKETS IN SUPPORT OF AT&T'S PETITION TO INITIATE PROCEEDING**

On April 10, 2001, the Florida Competitive Carriers Association ("FCCA") filed a Petition to Intervene in this docket. On the same day, the FCCA filed a Request for a Commission investigation "concerning the use of structural incentives" in this same docket. In its Request, the FCCA states that it supports AT&T's Petition, and like AT&T, FCCA "similarly recommends that this Commission initiate an investigation to evaluate the role of structural incentives in opening Florida's communications markets." *See* Request at 1. Like AT&T's Petition, the FCCA's Request seeks a "structurally realigned BellSouth." *See* Request at 4.

BellSouth hereby moves the Commission to dismiss the FCCA's Request or, in the alternative, to strike the Request. In support of this Motion, BellSouth incorporates by reference all of the arguments set forth in the Motion to Dismiss or in the Alternative Motion to Strike AT&T'S Petition Seeking the Structural Separation of BellSouth Telecommunications, Inc. that BellSouth filed in this docket on or about April 10, 2001.

Respectfully submitted this 17th day of April 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

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