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

Re: Docket No. 990649-TP – Investigation into Pricing of Unbundled
Network Elements

Dear Ms. Bayó,

Enclosed for filing on behalf of MCI WorldCom, Inc. and AT&T
Communications of the Southern States, Inc., are the original and fifteen copies of their
Motion to Require BellSouth To Authorize Use of its BSTLM, to Require Verizon to
Provide Data and Inputs for the BSTLM, and to Continue the Hearing.

By copy of this letter, this document has been provided to the parties on the
attached service list.

Thank you for your assistance in this matter.

Sincerely,

Donna Canzano McNulty
Donna Canzano McNulty

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325 John Knox Road, Suite 105
Tallahassee, FL 32303
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into) Docket No. 990649-TP
 Pricing of Unbundled Network Elements)
 _____) Filed: May 17, 2001

**MOTION TO REQUIRE BELLSOUTH TO AUTHORIZE USE OF ITS BSTLM,
 TO REQUIRE VERIZON TO PROVIDE DATA AND INPUTS FOR THE BSTLM,
 AND TO CONTINUE THE HEARING**

MCI WorldCom, Inc., and its operating subsidiaries, (collectively "WorldCom")
 and AT&T Communications of the Southern States, Inc. (AT&T) hereby file, pursuant to
 Rule 28-106.204, Florida Rules of Administrative Procedure, their Motion to Require
 BellSouth to Authorize use of its BSTLM, to Require Verizon to Provide Data and Inputs
 for the BSTLM, and to Continue the Hearing, and states the following:

1. In Phase II of this docket involving establishing prices for BellSouth
 Telecommunications, Inc.'s (BellSouth's) unbundled network elements (UNEs),
 BellSouth developed a new cost model, called BellSouth Loop Model © (BSTLM). On
 April 18, 2001, the Commission used the results of the BSTLM in establishing UNE
 prices for BellSouth. At the time of this filing the order has not been issued.

2. According to the staff recommendation in Phase II, the BSTLM was used
 to derive the costs for unbundled loop elements and service-specific loops. "The BSTLM
 consists of two primary modules: the Geographic Information System (GIS) Pre-
 processing module, and BSTLM's main module. The model documentation provides:

The module uses data obtained from multiple sources. In essence pre-processing
 prepares "raw" data for use by the main module and represents one of BSTLM's

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most significant data sources. Pre-processing develops the location data (customer location), road networks, wire center boundaries, network element locations, links the location data with attributes such as services records and delimits the data on a common basis – wire center boundaries. (EXH 95, Appendix H, p. 9)

The BSTLM main module is comprised of three processes. First, the GIS process clusters customers into serving areas, places specific network elements and determines media routes. Second, the Network process consists of three sub-processes: Configuration, Investment and Summary. Third, the Reporting process allows a user to generate a large number of customer reports.” (EXH 95, Appendix H, p. 10). (Staff recommendation, pg. 147, April 6, 2001)

3. WorldCom and AT&T seek to use the Commission-approved BSTLM for determining the appropriate UNE costs for Verizon in Phase III of this proceeding. WorldCom asked BellSouth for permission to use the BSTLM in Phase III with respect to Verizon; however, BellSouth denied WorldCom’s request. WorldCom and AT&T respectfully request the Commission to order BellSouth to authorize WorldCom and AT&T to use the BSTLM in Phase III of this proceeding regarding Verizon. In the alternative, WorldCom and AT&T respectfully request the Commission to order BellSouth to authorize the Commission or a neutral third party to use the BSTLM using the inputs established by the Commission for Verizon.

4. Use of the BSTLM would be beneficial in Phase III for several reasons. First, it would be expeditious for the Commission and Staff to use it, because they are already familiar with how the model runs from Phase II. Second, the Commission has already approved use of the BSTLM as a tool for determining forward-looking UNE prices.

5. Verizon is expected to file its own cost study on May 18, 2001 and therefore is not prejudiced by the ALECs' use of the BSTLM in their direct case. Verizon also will have an opportunity to respond to the ALECs' testimony.

6. WorldCom and AT&T acknowledge that the BSTLM is proprietary to BellSouth. The parties signed a non-disclosure agreement with BellSouth for Phase II, and WorldCom and AT&T would be willing to enter into another non-disclosure agreement for use of the BSTLM for Phase III regarding Verizon.

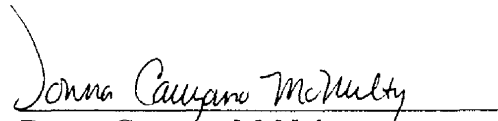
7. Should the Commission grant the motion discussed above, WorldCom and AT&T also respectfully request that the Commission order Verizon to provide its data and inputs to WorldCom and AT&T in the appropriate format for use in the BSTLM.

8. WorldCom and AT&T also respectfully request to continue Phase III of the hearing regarding Verizon. A continuance would give the parties adequate time to evaluate the inputs and process the results of the BSTLM. Further, on April 18, 2001, the Commission ordered BellSouth to file justification for certain items in Phase II. Therefore, a continuance would provide the Commission an opportunity to concentrate on the BellSouth portion of the docket that is pending. Accordingly, WorldCom and AT&T respectfully request a continuance of Phase III as it relates to Verizon until after the conclusion of Phase II. WorldCom and AT&T do not object to a continuation for the Sprint portion of the docket.

WHEREFORE, WorldCom and AT&T respectfully request the entry of an Order requiring BellSouth to authorize use of its BSTLM for establishing UNE costs for Verizon, requiring Verizon to provide WorldCom and AT&T its data and inputs in the

appropriate format for use in the BSTLM, and continuing the hearing for Phase III regarding Verizon until after the conclusion of Phase II regarding BellSouth.

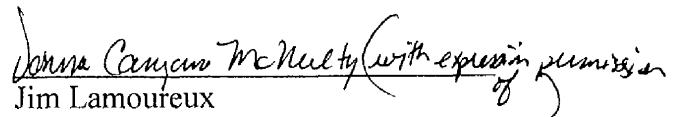
Respectfully submitted this 17th day of May, 2001.



Donna Canzano McNulty
WorldCom, Inc.
325 John Knox Road, Ste. 105
Tallahassee, FL 32303
(850) 422-1254

Attorney for MCI WorldCom, Inc.

and



Jim Lamoureux
AT&T Communications of the
Southern States, Inc.
1200 Peachtree Street, N.E.
Atlanta, GA 30309
(404) 810-4196

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivery (*) or facsimile (**) this 17th day of May, 2001.

*Beth Keating
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold, & Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

Floyd Self/Norman Horton, Jr.
Messer, Caparello & Self
P.O. Drawer 1876
215 S. Monroe Street Suite 701
Tallahassee, FL 32302-1876

Marsha Rule
AT&T Communications
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301

Susan Hither
Rick Heater
M.C. Communications, Inc.
3301 Worth Buffalo Drive
Las Vegas, Nevada 89129

James C. Falvey, Esq.
e.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, MA 20701

Jeremy Marcus
Kristen Smith
Blumenfeld & Cohen
1625 Massachusetts Ave. NW
Suite 300
Washington, D.C. 20036

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M. Street, N.W.
Suite 800
Washington, DC 20036

**Kimberly Caswell
Verizon Select Services, Inc.
One Tampa City Center
201 North Franklin Street
Tampa, FL 33601-0110

Carolyn Marek
Vice President of Regulatory
Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Donna Canzano McNulty, Esq.
MCI WorldCom
325 John Knox Road Suite 105
Tallahassee, FL 32303

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551

Karen M. Camechis
Pennington, Moore, Wilkinson &
Dunbar
P.O. Box 10095
Tallahassee, FL 32302

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications
3625 Queen Palm Dr.
Tampa, FL 33619

Cathy Boone
Covad Communications, Co.
10 Glen Lake Parkway
Suite 650
Atlanta, GA 30328

Charles J. Rehwinkel
Sprint
P.O. Box 2214
Tallahassee, FL 32316

Bettye Willis
ALLTEL Communications
Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

J. Jeffrey Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

Florida Digital Network, Inc.
390 N. Orange Ave., Suite 2000
Orlando, FL 32801

KMC Telecom, Inc.
John McLaughlin
Suite 170
3025 Breckinridge Blvd.
Duluth, Ga 30096

MCI WorldCom, Inc.
Mr. Brian Sulmonetti
Concourse Corporate Center Six
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Office of Public Counsel
Stephen C. Reilly
c/o The Florida Legislature
111 W. Madison Street, Rm. 812
Tallahassee, FL 32399-1400
Holland Law Firm

Bruce May
P.O. Drawer 810
Tallahassee, FL 32302

John Fons
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

George S. Ford
Chief Economist
Z-Tel Communications, Inc.
601 South Harbor Island Blvd.
Tampa, FL 33602

Genevieve Morelli
Eric D. Jenkins
Kelley Dry & Warren, LLP
1200 19th Street, NW,
Fifth Floor
Washington, DC 20036

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2004

Hope G. Colantonio
Cleartel Communications, Inc.
1255 22nd Street N.W.
6th Floor
Washington, DC 20037

John Spilman
Broadslate Networks of
Florida, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911

Network Access Solutions
Corporation
100 Carpenter Drive, Suite 206
Sterling, VA 20164

Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

Patrick K. Wiggins, Esq.
Charles J. Pellegrini
Katz Kutter Law Firm 12th Fl
106 East College Ave.
Tallahassee, FL 32301

Brent E. McMahan
Vice President-Regulatory and
Government Affairs
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501

Jim Lamoureux, Esq.
AT&T Communications of the
Southern States, Inc.
1200 Peachtree Street.
Suite 8068
Atlanta, GA 30309

Michael C. Sloan
Swidler Berlin Shereff
Friedman
3000 K Street, N.W.
Washington, DC 20007



Attorney