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September 7, 2001


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

Re: 960786-TL (Section 271)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Staff Recommendation, 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 by Federal Express as shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (KA)

Enclosures

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

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**CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Hand Delivery (*) and Federal Express this 7th day of September, 2001 to the following:

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(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s entry into)
interLATA services pursuant to Section)
271 of the Federal Telecommunications)
Act of 1996.)

Docket No. 960786-TL

Filed: September 7, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE TO STAFF RECOMMENDATION**

Now comes BellSouth Telecommunications, Inc. ("BellSouth"), and pursuant to Staff's e-mail of August 31, 2001, hereby files its comments on Staff's Recommendation the Prehearing Officer regarding testimony in the above captioned docket.

1. BellSouth filed a Motion to Strike Portions of Intervenors' Direct Testimony on August 17, 2001 and a page/line summary of the testimony it believed should be stricken on August 21, 2001.

2. Staff issued a Recommendation on August 31, 2001 addressing testimony not identified by BellSouth in its Motion to Strike that Staff believes should be removed from the hearing track of this proceeding and allowed to be refilled as comments in the OSS testing track. Staff stated the parties could file responses to the recommendation by noon on September 7, 2001.

3. BellSouth's response is grouped in four categories. First, BellSouth objects to the deletion of BellSouth's testimony that does not involve OSS/third party testing issues, specifically:

A. Cox - Surrebuttal - p. 32, line 20 through p. 33, line 9 - this testimony sets forth the situation in which an electronic ordering charge may be imposed and is in response to rebuttal testimony filed by Sprint witness Mark G. Felton (p. 6, lines 7-14). This portion of this witness' rebuttal testimony is not listed in Attachment A. As such, BellSouth believes it is also appropriate to exclude this portion of Mr. Felton's testimony from Attachment A if the Commission agrees not to strike this section of Cox's surrebuttal testimony.

B. Milner - Direct - p. 41, line 19 through p. 43, line 4 - this testimony should not be stricken because Mr. Milner is discussing the capabilities of DCS, not OSS.

C. Milner - Direct - p. 62, line 6 through p. 68, line 20 - this testimony should not be stricken because Mr. Milner is discussing how BellSouth effects the acquisition by ALECs of unbundled loops.

D. Milner - Direct - p. 75, line 10 through p. 76, line 8 - this testimony should not be stricken because Mr. Milner is discussing how BellSouth ensures proper interconnection when an ALEC turns up an NXX code, not OSS.

4. Second, BellSouth has no objection to the following testimony being stricken provided that the corresponding ALEC testimony is removed as well:

- A. Ainsworth - Surrebuttal - as listed in Attachment A
- B. Latham - Direct - as listed in Attachment A
- C. Milner - Surrebuttal - as listed in Attachment A
- D. Scollard - Surrebuttal - as listed in Attachment A
- E. Williams - Direct - as listed in Attachment A

5. Third, BellSouth has no objection to the following testimony being stricken, provided that the corresponding ALEC testimony is removed as well. Staff's Recommendation does not address all of the ALEC testimony that is the subject of the following surrebuttal and therefore, to that extent, BellSouth objects to the striking of those portions noted.

A. Pate - Surrebuttal - BellSouth objects to striking p.1, line 1 through p.3, line 9; p.14, line 22 through p.18, line 1; and p.26, line 18 through p.28, line 11. These portions of Mr. Pate's surrebuttal address rebuttal testimony filed by Steven Turner and Judy Wheeler of AT&T, neither of whom are listed in Attachment A.

B. Varner - Surrebuttal - BellSouth objects to striking p.1 line 1 through 11, line 23 and p.60 line 24 through p.75, line 15. These portions of Mr. Varner's surrebuttal address rebuttal testimony filed by Mr.

Sfakianos of KMC, Ms. Campbell of Nuvox and Ms. Patfield of XO Florida, none of whom are listed in Attachment A.

6. Fourth, BellSouth has no objection to the ALEC testimony listed in Attachment A being deleted subject to the inconsistencies pointed out in paragraph 5 herein.

WHEREFORE, BellSouth submits its response to Staff Recommendation.

Respectfully submitted this 7th day of September 2001.

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