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September 10, 2001

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
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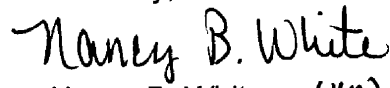
Re: 960786-TL (Section 271)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, 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

DOCUMENT NUMBER-DATE
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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 10th day of September, 2001 to the following:

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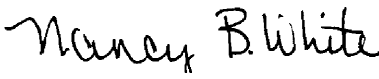
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Nancy B. White (KA)

(+) 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 10, 2001

PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth") in compliance with the Order on Status Conference and Updating Procedures (Order No. PSC-01-0832-PCO-TL) issued on March 30, 2001, hereby submits its Prehearing Statement.

A. Witnesses

BellSouth proposes to call the following witnesses to offer direct and surrebuttal testimony on the issues in this matter:

<u>Witness</u>	<u>Issues</u>
Cynthia K. Cox (Direct and Surrebuttal)	All issues
D. Daonne Caldwell (Direct and Surrebuttal)	2 - 15
W. Keith Milner (Direct and Surrebuttal)	2 - 15
David P. Scollard (Direct and Surrebuttal)	2(d), (e); 6(a); 7(a)
Thomas G. Williams (Direct and Surrebuttal)	5

<u>Witness</u>	<u>Issues</u>
Wiley G. Latham (Direct)	5
Kenneth L. Ainsworth (Surrebuttal)	10 and 12
Alphonso Varner (Surrebuttal)	2 - 15
A. Wayne Gray (Surrebuttal)	2
Ronald M. Pate (Surrebuttal)	2 - 15
Dr. William E. Taylor (Surrebuttal)	1

BellSouth reserves the right to call witnesses to respond to Commission inquiries not addressed in direct or surrebuttal 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 September 20, 2001.

B. Exhibits

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 the Rules of the Commission.

<u>Witness</u>	<u>Document Indicator</u>	<u>Title of Exhibit</u>
Cynthia K. Cox	CKC-1	Glossary
	CKC-2	FPSC Proceedings
	CKC-3	Checklist Compliance Matrix
	CKC-4	Competition Affidavit
	CKC-5	BellSouth's SGAT
	CKC-6	FCC Report on Local Telephone Competition
	CKC-7	User Groups
	CKC-8	CLEC Inforum
	CKC-9	BellSouth Line Sharing Collaborations
	CKC-10	BellSouth's Winback Review Recommendations and Implementation
D. Daonne Caldwell	Revised DDC-1	Cost Studies for Line Sharing, Collocation, and UCL-ND
	DDC-2	Modifications to Cost of Capital, Depreciation, Taxes and Inflation
	DDC-3	Modifications to Nonrecurring Work Times
	DDC-4	Comparison of Costs
W. Keith Milner	WKM-1	Physical and Virtual Collocation Arrangements
	WKM-2	Work Steps in Coordinated Loop Cutover
	WKM-3	Process Flow Chart
	WKM-4	Methods/Procedures for Process
	WKM-5	Work Flow Instructions
	WKM-6	Service Order Flow
	WKM-7	TOPS (All Flow via QMS)
	WKM-8	Affidavits of Nortel Employees
	WKM-9	Service Resale Units in Service
	WKM-10	LISC Response
	WKM-11	Distribution of Utilization
	WKM-12	Correspondence
	WKM-13	Correspondence
Attachment A	Affidavit of Wayne Gray	
Attachment B	Affidavit of Linda Kinsey	

	Attachment C	Affidavit of Doug Coutee
	Attachment D	Affidavit of Rook Baretto
	Attachment E	Affidavit of Dennis L. Davis
	Attachment F	Affidavit of Valerie Sapp
David P. Scollard	DPS	None
Thomas G. Williams	TGW-1	Order Flow
	TGW-2	Ordering and Provisioning Process
	TGW-3	Line Sharing Order Document
	TGW-3A	Field Information
	TGW-4	Job Aid
	TGW-5	Business Rules
	TGW-6	Maintenance Flow
	TGW-7	TAF1
	TGW-8	Trouble Receipt Process Flow
	TGW-9	Collaborative Team Charter
	TGW-10	Collaborative Team Charter
	TGW-11	Line Sharing Agreement
	TGW-12	Line Sharing Agreement
	TGW-13	Line Sharing Agreement
	TGW-14	Line Sharing Agreement
	TGW-15	Line Sharing Agreement
	TGW-16	Terms and Conditions
	TGW-17	Diagram
	TGW-18	Diagram
	TGW-19	Diagram
	TGW-20	Carrier Notification Letter
	TGW-21	Newsletter
	TGW-22	Diagram
	TGW-23	BellSouth Retail Voice Service
	TGW-24	CLEC Voice on BellSouth UNE-P
	TGW-25	Co-Based Line Splitting
Wiley G. Latham	WGL-1	BellSouth Unbundled Digital Loops
	WGL-2	ADSL and HDSL CLEC Information Package
	WGL-3	BellSouth Unbundled Copper Loops

	WGL-4	BellSouth Unbundled Copper Loop Non-Designed (UCL-ND) CLEC Information Package
	WGL-5	BellSouth Loop Makeup CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup
Kenneth L. Ainsworth	LCSC-1	Preliminary Research - UNE Issues
	LCSC-2	LCSC-Resale
Alphonso J. Varner	AJV-1	None
A. Wayne Gray	AWG-1	Access Services Tariff – E.20 Expanded Interconnection Service (EIS)
	AWG-2	FPSC Docket Nos. 981834-TP/990321-TP – Order No. PSC-99-1744-PAA-TP
	AWG-3	FPSC Docket Nos. 981834-TP/990321-TP – Order No. 99-2392-FOF-TP
	AWG-4	FPSC Docket Nos. 981834-TP/990321-TP – Order No. 00-0941-FOF-TP
	AWG-5	Physical Collocation
	AWG-6	FCC Memorandum and Opinion; CC Docket 98-147, Dated 2/21/01
	AWG-7	Letter from Blau to Strickling dated 4/14/00
	AWG-8	Remote Site Physical Collocation
	AWG-9	Microwave Collocation
	AWG-10	Diagram
Ronald M. Pate	OSS-69	Detailed Analysis
Dr. William E. Taylor	WET-1	Curriculum Vitae
	WET-2	Press Release
	WET-3	Competition Reporting Form

C. Statement of Position

BellSouth has filed with this Commission, pursuant to Section 252 of the Act, a Statement of Generally Available Terms and Conditions ("SGAT"). This Commission should approve the Statement as compliant with Section 252(f) and with the Competitive Checklist found in Section 271(c)(2)(b). Further, this Commission should find that BellSouth has in place negotiated agreements, which have been filed with this Commission, by which it is providing interconnection arrangements, and that at least some of these arrangements are being utilized by competing providers to serve residential and business customers. Finally, this Commission should find that BellSouth's interconnection agreements, in conjunction with the Statement filed by BellSouth, satisfy the 14-point checklist, and should advise the FCC to this effect.

D. BellSouth's Position on the Issues

Issue No. 1. Has BellSouth met the requirements of Section 271(c)(1)(A) of the Telecommunications Act of 1996?

- (a) Has BellSouth entered into one or more binding agreements approved under Section 252 with unaffiliated competing providers of telephone exchange service?
- (b) Does BellSouth currently provide access and interconnection to its network facilities for the network facilities of competing providers?

- (c) Are such competing providers providing telephone exchange service to residential and business customers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities?

Position: Yes. BellSouth has entered into over 500 binding agreements approved under Section 252 with unaffiliated competing providers. BellSouth is providing access and interconnection to competitive providers that are providing service to residential and business customers. As of February, 2001, ALECs provided 9.8 - 11.3% of the access lines in Florida.

Issue No. 2. Does BellSouth currently provide interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(i) and applicable rules promulgated by the FCC?

- (a) Has BellSouth implemented physical collocation requests in Florida consistent with FCC rules and orders?

Position: As of March 31, 2001, BellSouth has implemented approximately 1,500 ALEC requests for collocation.

- (b) Does BellSouth have legally binding provisioning intervals for physical collocation?

Position: Yes. BellSouth incorporated the provisioning intervals established by the Commission into its agreements and the SGAT.

- (c) Does BellSouth currently provide local tandem interconnection to ALECs?

Position: Yes. BellSouth developed a PLU factor for local tandem interconnection and terms and conditions are contained in BellSouth's agreements and in the SGAT.

- (d) Does BellSouth currently permit the use of a Percent Local Usage (PLU) factor in conjunction with trunking?

Position: Yes. The terms and conditions of the PLU factor are contained on BellSouth's agreements and in the SGAT.

- (e) Does BellSouth currently provide ALECs with meet point billing data?

Position: Yes. BellSouth provides MPB data to each ALEC pursuant to the terms and conditions contained in the agreement between BellSouth and the ALEC.

- (f) Has BellSouth satisfied other associated requirements, if any, for this item?

Position: Yes. Interconnection services are functionally available from BellSouth, and BellSouth has procedures in place for the ordering, provisioning and maintenance of its interconnection services.

Issue No. 3. Does BellSouth currently provide nondiscriminatory access to all required network elements, with the exception of OSS which will be handled in the third party OSS test, in accordance with Sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC?

- (a) Does BellSouth currently provide all required unbundled network elements at TELRIC-based prices?
- (b) Has BellSouth satisfied other associated requirements, if any, for this item?

Position: Yes. Access is available and provided to network elements on a nondiscriminatory basis in accordance with TELRIC pricing through BellSouth's interconnection agreements and SGAT. Issues pertaining to BellSouth's OSS will be resolved through the third party testing process.

Issue No. 4. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 224 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(iii). Does BellSouth currently provide nondiscriminatory access to the poles, ducts, and conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of Section 224 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(iii) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth provides nondiscriminatory access to poles, ducts, conduits and rights-of-way to any ALEC through its interconnection agreements and SGAT.

Issue No. 5. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(B)(iv) of the Telecommunications Act of 1996. Does BellSouth currently provide unbundled local loop transmission between the central

office and the customer's premises from local switching or other services, pursuant to Section 271(c)(2)(B)(iv) and applicable rules and orders promulgated by the FCC?

- (a) Does BellSouth currently provide all currently required forms of unbundled loops?
- (b) Has BellSouth satisfied other associated requirements, if any, for this item?

Position: Yes. BellSouth provides ALECs with access to all unbundled loops (including those served by IDLC) at any technically feasible point with access given to all features, functions, and capabilities of the loop, without any restrictions that impair their use, for an ALEC's exclusive use and in a manner that enables the ALEC to combine loops with other UNEs. This access is provided through the SGAT and the interconnection agreements.

Issue No. 6. Does BellSouth currently provide unbundled local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to Section 271(c)(2)(B)(v) and applicable rules promulgated by the FCC?

- (a) Does BellSouth currently provide billing for usage-sensitive UNEs?

Position: Yes. BellSouth has been billing ALECs for usage sensitive based UNEs since August of 1997.

- (b) Has BellSouth satisfied all other associated requirements, if any, for this item?

Position: Yes. Local transport is available from BellSouth. BellSouth currently bills for all usage-sensitive UNEs.

Issue No. 7. Does BellSouth currently provide unbundled local switching from transport, local loop transmission or other services, pursuant to Section 271(c)(2)(B)(vi) and applicable rules promulgated by the FCC?

- (a) Does BellSouth bill for unbundled local switching on a usage-sensitive basis?

Position: Yes. BellSouth has been billing ALECs for usage sensitive unbundled local switching since 1997.

- (b) Does BellSouth currently provide unbundled local switching on both the line-side and the trunk-side of the switch?

Position: Yes. BellSouth provides ALECs with local circuit switching on an unbundled basis, with the exception contained in the FCC's UNE Remand Order.

- (c) Has BellSouth satisfied other associated requirements, if any, for this item?

Position: Yes. BellSouth provides unbundled local circuit switching through its interconnection agreements and offers it via the SGAT as well.

Issue No. 8. Does BellSouth currently provide nondiscriminatory access to the following, pursuant to Section 271(c)(2)(B)(vii) and applicable rules promulgated by the FCC:

- (i) 911 and E911 services;
- (ii) directory assistance services to allow other telecommunications carrier's customers to obtain telephone numbers; and
- (iii) Operator call completion services?

- (a) Does BellSouth currently provide ALECs access to all information contained in BellSouth's directory listing database?
- (b) Does BellSouth currently provide selective routing in Florida?
- (c) Has BellSouth satisfied other associated requirements, if any, for this item?

Position: Yes. Nondiscriminatory access is available to 911 and E911 service, to directory assistance services and to operator call completion through BellSouth's interconnection agreements and the SGAT. All information in BellSouth's directory assistance listing database is available to ALECs. BellSouth also offers selective routing in Florida.

Issue No. 9. In Order No. PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(viii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to Section 271(c)(2)(B)(viii) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth offers through its interconnection agreements, as well as its SGAT, white pages directory listings to ALECs and their subscribers which include the subscriber's name, address, and telephone number at no charge.

Issue No. 10. In Order No. PSC-97-1459-FOF-TL, issued November 19,

1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(ix) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to Section 271(c)(2)(B)(ix) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth offers through its interconnection agreements, as well as its SGAT, nondiscriminatory access to telephone numbers.

Issue No. 11. In Order No. PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(x) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to databases and associated signaling necessary for call routing and completion, pursuant to Section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth provides ALECs with nondiscriminatory access to databases and associated signaling through BellSouth's interconnection agreements and through the SGAT.

Issue No. 12. In Order No. PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xi) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide number portability, pursuant to Section 271(c)(2)(B)(xi) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth provides interim number portability arrangements, and permanent number portability consistent with the Act and the FCC's regulations. BellSouth also has an approved tariff for the end-user line charge and the query charges.

Issue No. 13. In Order No. PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 271(c)(2)(B)(xii) and applicable rules promulgated by the FCC?

Position: Yes. Local service subscribers in BellSouth's service area in Florida dial the same number of digits to place a local call, without the use of an access code, regardless of their choice of local service provider.

Issue No. 14. In Order No. PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xiii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2) of the Telecommunications Act of 1996, pursuant to Section (271)(c)(B)(xiii) and applicable rules promulgated by the FCC?

Position: Yes. BellSouth has arrangements in place in its interconnection agreements as well as in its SGAT, to provide reciprocal compensation. These arrangements provide for the mutual and reciprocal

recovery of the costs of transporting and terminating local calls on BellSouth and ALEC networks.

Issue No.15. Does BellSouth currently provide telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiv) and applicable rules promulgated by the FCC?

Position: Yes. Through BellSouth's agreements and SGAT, BellSouth offers its tariffed retail telecommunications services to ALECs for resale. BellSouth's interconnection agreements and SGAT contain the specific terms and conditions that apply to the resale of certain services.

Issue No.16. By what date does BellSouth propose to provide intraLATA toll dialing parity throughout Florida pursuant to Section 271(e)(2)(A) of the Telecommunications Act of 1996?

Position: BellSouth has provided 1 + intraLATA presubscription in all of its end offices in Florida since the end of March 1997.

Issue No.17. If the answers to Issues 1 through 15 are "yes", have those requirements been met in a single agreement or through a combination of agreements?

Position: These requirements have been met through a combination of Agreements, and have been met as well by BellSouth's Statement of Generally Available Terms and Conditions.

Issue No. 18. Should this docket be closed?

Position: This docket should be closed only after the Commission has concluded its consultative role to the FCC.

E. Stipulations

There have been no stipulations entered into by the parties at this time.

F. Pending Motions

BellSouth's Motion for Extension of Duration of Order Granting Confidential Classification filed on January 25, 2001.

BellSouth's Motion to Strike Portions of Selected Intervenor's Direct Testimony filed on August 17, 2001.

G. Other Requirements

BellSouth knows of no requirements set forth in any Prehearing Order with which it cannot comply.

Respectfully submitted this 10th day of September 2001.

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