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October 5, 2001

**BY HAND DELIVERY**

Blanca Bayó  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Re: Docket No. 960786A-TL

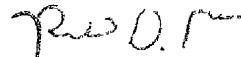
Dear Ms. Bayó:

Enclosed for filing on behalf of WorldCom, Inc. and its operating subsidiaries are the original and fifteen copies of:

- (1) it Motion for Leave to File Supplemental Rebuttal Testimony *12720-01*
- (2) the Supplemental Rebuttal Testimony of Greg Darnell *12721-01*

By copy of this letter, these documents have been furnished to the parties on the attached service list. If you have any questions regarding this filing, please give me a call at 425-2313.

Very truly yours,



Richard D. Melson

RDM/mee  
Enclosure  
cc: Certificate of Service

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Consideration of	)	
BellSouth Telecommunications,	)	Docket No. 960786A-TL
Inc.'s entry into interLATA	)	
services pursuant to Section 271	)	
of the Federal	)	Filed: October 5, 2001
Telecommunications Act of 1996.	)	
_____	)	

**WORLDCOM'S MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL REBUTTAL TESTIMONY**

WorldCom, Inc. and its operating subsidiaries (WorldCom), hereby move the Commission for leave to file the Supplemental Rebuttal Testimony of Greg Darnell. In support of this motion, WorldCom states:

1. Mr. Darnell previously filed rebuttal testimony in this docket dated July 20, 2001. That testimony addresses the reasons that BellSouth's UNE rates do not comply with TELRIC pricing principles and that BellSouth therefore fails to meet checklist item (ii) (Issue 3 in this proceeding). In particular, that rebuttal testimony addresses various ways in which the rates approved by the Commission in its Final Order in Docket No. 990649-TP deviate from TELRIC.

2. On October 2, 2001, the Commission on reconsideration modified its decision in Docket No. 990649-TP by reinstating inflation factors which had previously been disallowed by the Final Order in that docket. The effect of reinstating the inflation adjustment is to depart even further from TELRIC and to dramatically increase BellSouth's UNE rates.

3. Mr. Darnell did not address BellSouth's inflation adjustment in his rebuttal testimony. At the time that testimony was filed, the Commission had properly disallowed the inflation adjustment and the rates relied upon by BellSouth to demonstrate checklist compliance

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did not include the effect of that adjustment.

4. In light of the decision on reconsideration, the UNE rates that BellSouth is relying on to demonstrate checklist compliance are now substantially different from the rates that had been approved at the time Mr. Darnell's testimony was originally filed. It is therefore appropriate for Mr. Darnell to supplement his testimony to address the reasons that the reinstatement of the inflation adjustment results in rates that present even more substantial problems of non-compliance with TELRIC. Mr. Darnell's supplemental rebuttal testimony, submitted simultaneously herewith, addresses the impact of reinstating the inflation adjustment on BellSouth's compliance with checklist item (ii). Without this testimony, the Commission will not have before it in this docket a complete picture of the reasons that BellSouth's UNE rates are not checklist compliant.

5. In addition, BellSouth recently filed updated cost studies for Daily Usage Files in both Florida (September 24) and Georgia (October 1). The results of these studies demonstrate that the Daily Usage File rates proposed by BellSouth and approved by the Commission in Docket No. 990649-TP are not TELRIC-based. Mr. Darnell's supplemental rebuttal testimony addresses this additional information from BellSouth that was not available at the time his original testimony was filed.

6. The acceptance of this supplemental rebuttal testimony will not unfairly prejudice BellSouth. The original Final Order in the UNE docket permitted BellSouth to attempt to further justify its inflation adjustment in its "120-day" filing, which was submitted in Docket No. 990649-TP on September 24, 2001. In addition, BellSouth has updated its Daily Usage File rates to a limited degree in that September 24 filing. To the extent BellSouth wishes to respond

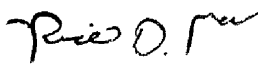
to Mr. Darnell's supplemental rebuttal testimony, it should be simple for BellSouth to submit the justification filed in that proceeding as additional testimony in this docket.

7. Because of the short time remaining before the hearing in this docket begins, WorldCom has served this motion and the accompanying testimony on all parties by e-mail and in addition has hand-delivered these filings to BellSouth.

WHEREFORE, WorldCom respectfully requests that the Commission grant it leave to file the supplemental rebuttal testimony of Mr. Greg Darnell submitted simultaneously herewith.

RESPECTFULLY SUBMITTED this 5th day of October, 2001.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by hand delivery (\*) or by U.S. Mail to the following parties this 5th day of October, 2001.

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