

Nancy B. White
General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

October 17, 2001

Mrs. Blanca S. Bayb
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

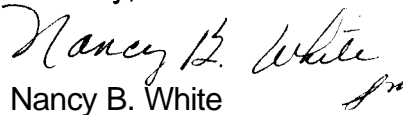
Re: **960786B-TL (Section 271)**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Response to the Joint ALECs' Motion Requesting Workshop 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 of record as shown on the certificate of service.

Sincerely,


Nancy B. White

Enclosures

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

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

**I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
Federal Express and this 17th day of October, 2001 to the following:**

Mr. Brian Sulmonetti (+)
LDDS **WorldCom** Communications
Suite 3200
6 Concourse Parkway
Atlanta, GA 30328
Tel. No. (770) 2844493
Fax. No. (770) 284-5488
brian.sulmonetti@wcom.com

Floyd R. Self, Esq. (+)
Messer Law Firm
215 South Monroe Street
Suite 701
P.O. Box 1876
Tallahassee, FL 32302-I 876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents **LDDS/ACSI**
fself@lawfla.com

Vicki Gordon Kaufman (+)
Joseph A. **McGlothlin (+)**
McWhirter, Reeves, **McGlothlin**,
Davidson, Rief & Bakas, P.A.
117 South **Gadsden** Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Represents FCCA
Represents **NewSouth**
Represents KMC
Represents **NuVox** Comm.
Represents ACCESS
Represents **XO**
Represents Z-Tel
vkaufman@mac-law.com
jmclglothlin@mac-law.com

Charles J. Beck
Office of Public Counsel
111 W. Madison Street
Suite 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax No. (850) 488-4992
Beck.Charles@leg.state.fl.us

Richard D. **Melson (+)**
Hopping Green Sams & Smith
123 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Represents MCI, Rhythms
RMelson@hgss.com

Susan S. Masterton (+)
Sprint Communications Co.
Post Office Box 2214 (zip 32316-2214)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. (850) **599-1560**
Fax (850) 878-0777
susan.masterton@mail.sprint.com

Beth Keating, Staff Counsel
MaryAnne Helton
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 323990850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us
mhelton@psc.state.fl.us

Scott Sapperstein
Intermedia Comm., Inc.
One Intermedia Way
MCFLT-HQ3
Tampa, Florida 33647-1 752
Tel. No. (813) 8294093
Fax. No. (813) 8294923
Sasapperstein@intermedia.com

Rhonda P. Merritt
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 4256342
Fax. No. (850) 4256361
rpmerritt@ATT.com

James P. Lamoureux (+)
Senior Attorney
AT&T Communications of
the Southern States, Inc.
1200 Peachtree Street, NE.
Atlanta, GA 30309
Tel. No. (404) **810-4196**
Fax No. (404) 877-7648
jlamoureux@att.com

Kenneth A. Hoffman, Esq. (+)
Rutledge, Ecenia, Underwood,
Pumell & Hoffman, P.A.
215 South Monroe Street
Suite 420
P.O. Box 551
Tallahassee, FL 32302
Tel No. (850) 6816788
Fax. No. (850) **681-6515**
Represents TCG
Represents US LEC
Ken@Reuphlaw.com

John R. Marks, III
215 South Monroe Street
Suite 130
Tallahassee, FL 32301
Tel. (850) 222-3768
Fax. (850) 561-0397
Represents **BellSouth**
JohnM@KMRLaw.com

Kenneth S. Ruth
Florida Director CWA
2180 West State Road 434
Longwood, FL 32779
Tel. (407) 772-0266
Fax. (407) 772-2516
Kruth@cwa-union.org

Marilyn H. Ash
MGC Communications, Inc.
3301 N. Buffalo Drive
Las Vegas, NV 89129
Tel. No. (702) 3108461
Fax. No. (702) 310-5689

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 6395602
Fax. No. (202) 7834211
rljoyce@shb.com
Represents Network Access Solutions

Michael Gross/Charles Dudley (+)
FCTA, Inc.
246 E. 6th Avenue
Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 6819676
mgross@fcta.com

Nanette Edwards
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
Fax. No. (256) 382-3969
nedwards@itcdeltacom.com
Represented by Hopping Law Firm

Donna **McNulty**
MCI **WorldCom**
325 John Knox Road
Suite 105
Tallahassee, FL 323034131
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mculty@wcom.com

Network Access Solutions Corp.
100 Carpenter Drive
Suite 206
Sterling, VA 20164
Tel. No. (703) 742-7700
Fax. No. (703) 742-7706
Represented by Shook, Hardy & Bacon

Karen Camechis (+)
Pennington Law Firm
215 South Monroe Street
2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Represents Time Warner
karen@penningtonlawfirm.com

Rhythms Links, Inc.
6933 South Revere Parkway
Suite 100
Englewood, CO 80112
Tel. No. (303) 4764200
Represented by Hopping Law Firm

Benjamin **Fincher**
Sprint/Sprint-Metro
3100 Cumberland Circle
#802
Atlanta, GA 30339
Tel. No. (404) **649-5144**
Fax. No. (404) **649-5174**
Represented by **Ervin** Law Firm

Carolyn Marek
Time Warner
Regulatory **Affairs**, SE Region
233 Bramerton Court
Franklin, TN 37069
Tel. No. (615) 3766404
Fax. No. (615) 3766405
carolyn.marek@twtelecom.com
Represented by Pennington Law Firm
Represented by Parker Poe Adams

James Falvey
ACSI
131 National Business Parkway
Annapolis Junction, MD 20701
Represented by Messer Law Firm

Matthew Feil (+)
Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) **835-0460**
mfeil@floridadigital.net

Michael Sloan (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Suite 300
Washington, **D.C.** 20007-5116
Tel. No. (202) 2958458
Fax No. (202) 424-7645
Represents FDN
mcsloan@swidlaw.com

Katz, Kutter Law Firm (+)
Charles J. **Pellegrini/Patrick** Wiggins
106 E. College Avenue
Tallahassee, FL 32301
Tel. No. **850-224-9634**
Fax. No. **850-224-9634**
pkwiggins@katzlaw.com

Lori Reese
Vice President of Governmental Affairs
NewSouth Communications
Two Main **Street**
Greenville, South Carolina **29609**
Tel. No. (864) 6725177
Fax. No. (864) 6725040
lreese@newsouth.com

Genevieve **Morelli**
Andrew M. Klein
Kelley Drye & Warren LLP
1200 19th **Street**, NW
Suite 500
Washington, DC 20036
Represents KMC
aklein@kelleydrye.com

John D. McLaughlin, Jr.
KMC Telecom
1755 North Brown Road
Lawrenceville, Georgia 30043
jmclau@kmctelecom.com

Suzanne F. Summerlin, Esq.
1311 **-B** Paul Russell Road
Suite 201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589
Represents IDS Telecom
summerlin@nettally.com

Henry C. **Campen**, Jr. (+)
Parker, Poe, Adams & Bernstein, LLP
P.O. Box **389**
First Union Capital Center
150 Fayetteville Street Mall
Suite 1400
Raleigh, NC 27602-0389
Tel. No. (919) 8904145
Fax. No. (919) **834-4564**
Represents US LEC of Florida
Represents **NuVox** Comm.
Represents **XO**
Represents Time Warner
henrycampen@parkerpoe.com

Catherine F. Boone
Covad Communications Company
10 **Glenlake** Parkway, Suite 650
Atlanta, Georgia 303283495
Tel. No. (678) 222-3466
Fax. No. (678) 320-0004
cboone@covad.com

Bruce Culpepper, Esq.
Akerman, **Senterift** & Eidson
301 South Bronough Street
Suite 200
Post **Office** Box 10555
Tallahassee, FL 32302-2555
Attys. for AT&T
Tel. No. (850) 222-3471
Fax. No. (850) 222-8628

Mark D. Baxter
Stone & Baxter, LLP
557 Mulberry Street
Suite 1111
Macon, Georgia 312018256
Represents ACCESS
mbaxter@stoneandbaxter.com

Dana Shaffer
XO Communications, Inc.
105 **Molloy** Street, Suite 300
Nashville, Tennessee 37201-2315
Tel. (615) 777-7700
Fax. (615) 345-1564
dana.shaffer@xo.com
Represented by Parker Poe Adams

Peggy Rubino
Z-Tel Communications, Inc.
601 South Harbor Island Boulevard
Suite 220
Tampa, Florida 33602
Tel. No. (813) 2334611
Fax. No. (813) 2334620


Nancy B. **White**

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of **BellSouth**)
Telecommunications, **Inc.'s** entry into)
interLATA services pursuant to Section)
27 1 of the Federal Telecommunications)
Act of 1996.)

Docket No. **960786B-TL**

Filed: October 17, 2001

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE TO THE JOINT ALECs' MOTION REQUESTING WORKSHOP

BellSouth Telecommunications, Inc. ("**BellSouth**"), pursuant to the Florida Administrative Code, hereby files its Response to the Motion Requesting Workshop filed by the Joint ALECs on October 11, 2001. Specifically, **BellSouth** states as follows:

1. The Joint ALECs allege that the Commission should establish a workshop at the conclusion of the KPMG third party test to allow ALECs the opportunity to present "commercial usage information, i.e., real world experience." (Motion, p.2). **BellSouth** opposes the Motion of the Joint ALECs on several bases.

2. First, there is a significant distinction between commercial usage information and so-called real world experience. This Commission has already determined that commercial volumes will be examined by KPMG in the third party test. See Order No. PSC-00-0104-PAA-TP. Further, the Commission determined that anecdotal evidence as to the experience of the

ALECs was a major raison d'être of the third party test. Specifically, the Commission in Order No.

PSC-99-1568-PAA-TP stated that the third party test would "provide better, more accurate information about the status of BellSouth's systems than might be obtained through further administrative proceedings on this issue."

3. Second, the Joint ALECs specifically requested that the issue of commercial experience should be included in Track A (the hearing track) of this docket. The Prehearing Officer, in Order No. PSC-OI-1025-PCO-TL, excluded this issue, finding that the Commission had required KPMG to address any differences between the access to OSS functions BellSouth provides itself and that which it provides to ALECs, with an analysis of the operational effect of the differences, an analysis of commercial data. The full Commission denied Motions for Reconsideration on this order in Order No. PSC-01 -1252-FOF-TL issued on June 5, 2001.

4. Third, the Prehearing Officer and the full Commission on reconsideration struck testimony relating to real world experiences from the testimony filed in Track A for the same reasons. See Order Nos. PSC-01-1830-PCO-TP and PSC-01-2021 -FOF-TL. These Orders found that the ALECs would have the opportunity to file comments, including affidavits in Track B and that this would act as a sufficient entry point for the ALECs to present their concerns. The ALECs will have adequate opportunity to discuss real world experiences in these comments and the Commission will

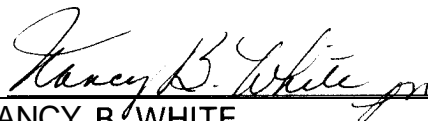
consider these comments fully in determining whether **BellSouth** has satisfied the third party test. Nothing further is required.

5. While **BellSouth** disagrees that ALECs have no opportunity to present their so-called “real world experiences,” **BellSouth** does not object to allowing ALECs the opportunity to present this type of information in a second one-day workshop under the following conditions:


- a) The second one-day workshop should be held within two weeks after the conclusion of the third party test;
- b) The ALECs should be required to provide **BellSouth** with the specifics of the alleged “real world experiences” two weeks prior to the workshop, sufficient to permit **BellSouth** to investigate the issue, including but not limited to end user name, address, purchase order number, dates, etc.;
- c) **BellSouth** should be given equal time to respond to any allegations presented by the ALECS;
- d) The workshop should not be used as a means to delay this Commission’s decision on **BellSouth’s** compliance with Section 27 1.

Respectfully submitted this 1 7th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
JAMES MEZA III
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-556 1



LISA FOSHEE
FRED MCCALLUM
E. EARL EDENFIELD JR.
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0763

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