

James Meza III
Attorney
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

November 15, 2001

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

Re: 011392-TP - Complaint of AT&T

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth's Answer to Complaint of AT&T Communications, Inc. which we ask that you file in the above-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,


James Meza III (ka)

Enclosures

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

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
Docket No. 011392-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 15th day of November, 2001 to the following:

Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Floyd R. Self
Tracy W. Hatch
Messer, Caparello & Self
Post Office Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720

James P. Lamoureux
AT&T
1200 Peachtree Street, N.E.
Atlanta, GA 30309

Attorneys for AT&T of the Southern
States, Inc., AT&T Broadband Phone
Of Florida, LLC and TCG South
Florida, Inc.


James Meza III
James Meza III (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of AT&T Communications) Docket No. 011392-TP
of the Southern States, Inc., TCG South)
Florida and AT&T Broadband Phone of)
Florida, LLC. against BellSouth)
Telecommunications, Inc. for improper use)
and treatment of certain NXX codes) Filed: November 15, 2001

BELLSOUTH'S ANSWER TO COMPLAINT

BellSouth Telecommunications, Inc. ("BellSouth") submits this Answer to the Complaint filed by AT&T Communications of the Southern States, Inc., TCG South Florida, Inc. and AT&T Broadband Phone of Florida, LLC (collectively "AT&T") with the Florida Public Service Commission ("Commission") on October 26, 2001. BellSouth's responses to the specific allegations of the Complaint are as follows:

1. BellSouth has no basis to dispute AT&T's statements regarding being certificated in the State of Florida or its official address for receiving communications. Therefore BellSouth admits the allegations in Paragraph 1 of the Complaint, subject to verification if necessary.

2. BellSouth admits the allegations of Paragraph 2 of the Complaint.

3. The allegations of Paragraph 3 of the Complaint do not require a response from BellSouth. In an abundance of caution, to the extent a response is required, they are denied.

4. BellSouth denies the allegations of Paragraph 4 of the Complaint, except to admit that the 930 NXX code is used by BellSouth in Florida and that

BellSouth considers the 930 NXX code to be an "oddball" code (also referred to as "special use codes").

5. BellSouth denies the allegations of Paragraph 5 of the Complaint, except to admit that (1) BellSouth is currently the sole carrier in Florida to use the 930 NXX code; (2) BellSouth's offers its tariffed Uniform Access Number product through the 930 NXX code in Florida; and (3) BellSouth informed AT&T that trunks from AT&T's switches to BellSouth's operator services platform known as the Traffic Operator Position System ("TOPS") are required to terminate calls from AT&T's customers served by AT&T's switches to the 930 NXX code.

6. BellSouth denies the allegations of Paragraph 6 of the Complaint, except to admit that (1) calls to the 930 NXX code in the 954 NPA are being blocked because AT&T has not established trunk groups between its switches and BellSouth's TOPS platform over which calls to the 930 NXX code would be completed; (2) BellSouth has informed AT&T that BellSouth is working on a plan that would allow calls to the 930 NXX code from AT&T's customers served by AT&T's switches to complete despite the fact that AT&T has not established trunk groups between its switches and BellSouth's TOPS platform over which calls to the 930 NXX code would be completed; and (3) BellSouth is not required to port any number in the 930 NXX code used for BellSouth's Uniform Access Number to another carrier.

7. BellSouth denies the allegations of Paragraph 7 of the Complaint.

8. BellSouth denies the allegations of Paragraph 8, except to admit that BellSouth and AT&T entered into an Interconnection Agreement, which speaks for itself and is the best evidence of its terms and conditions.

9. BellSouth denies the allegations of Paragraph 9 of the Complaint, except to admit that the Commission issued Order No. PSC-01-0824-FOF-TP in Docket No. 000649-TP. Order No. PSC-01-0824-FOF-TP speaks for itself and is the best evidence of its terms and conditions.

10. BellSouth denies the allegations of Paragraph 10 of the Complaint, except to admit that Federal Communication Commission's ("FCC") promulgated rule 51.207. The FCC's orders and rules speak for themselves and are the best evidence of their terms and conditions.

11. BellSouth denies the allegations of Paragraph 11 of the Complaint, except to admit that BellSouth previously was the central office code administrator and that it uses the 930 NXX code to offer its Uniform Access Number product.

12. BellSouth denies the allegations of Paragraph 12 of the Complaint, except to admit that the Commission issued Order No. PSC-01-1484-PCO-TL, which speaks for itself and is the best evidence of its terms and conditions.

13. —BellSouth denies the allegations of Paragraph 13 of the Complaint, except to admit that BellSouth is not required to port services and thus is not required to port numbers assigned to the 930 NXX code.

14. The portions of the Telecommunications Act of 1996 cited in Paragraph 14 speak for themselves and require no answer from BellSouth.

BellSouth denies AT&T's interpretation of the portions of the Act and BellSouth denies the allegations of Paragraph 14 of the Complaint.

15. BellSouth denies the allegations of Paragraph 15 of the Complaint, except to admit that the parties have previously discussed the issues raised in AT&T's Complaint.

16. BellSouth denies that AT&T is entitled to any of the relief requested in its Complaint.

17. Any allegation not specifically admitted herein is denied.

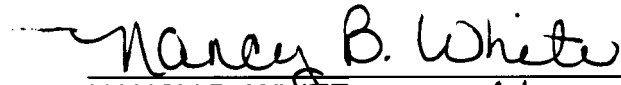
AFFIRMITIVE DEFENSES

18. To the extent AT&T is seeking the modification or reversal of the Commission's decision in Order No. 01-1484-PCO-TL regarding the use of oddball codes in the 386 NPA, such a claim is untimely and barred by the doctrine of waiver.

Wherefore, BellSouth respectfully requests that the Commission deny the relief sought by AT&T, enter judgment in favor of BellSouth, dismiss the Complaint, and grant any other relief deemed appropriate by the Commission.

Respectfully submitted this 15th day of November, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (102)
JAMES MEZA III
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5555

R. Douglas Lackey

R. DOUGLAS LACKEY
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0747

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