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March 26, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director
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Re: Docket No.: 011119-TP

Dear Ms. Bayo:

On behalf of XO Florida, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Rebuttal Testimony and Exhibit of Rex Knowles on behalf of XO Florida, Inc.; and 03450-02
- ▶ Rebuttal Testimony of John Seaton on behalf of XO Florida, Inc. 03449-02

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by XO Florida,
Inc. for arbitration of
Unresolved issues with BellSouth
Telecommunications, Inc.

Docket No.: 011119-TP
Filed: March 26, 2002

Rebuttal Testimony of John Seaton

on behalf of

XO Florida, Inc.

DOCUMENT NUMBER-DATE

03449 MAR 26 2002

FPSC-COMMISSION CLERK

1 **Q. PLEASE STATE YOUR NAME.**

2 **A. John Seaton.**

3 **Q: DID YOU SUBMIT DIRECT TESTIMONY IN THIS PROCEEDING.**

4 **A: Yes. I filed direct testimony on behalf of XO Florida, Inc.**

5 **Q: WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY.**

6 **A: The purpose of my Rebuttal Testimony is to respond to BellSouth witness**
7 **Ruscilli's testimony on Issue 11.**

8 **ISSUE 11 – SHOULD BELLSOUTH BE SUBJECT TO THE SAME CREDIT AND**
9 **DEPOSIT REQUIREMENTS AS XO WHEN PRUCHASING SERVICES FROM**
10 **XO**

11

12 **Q: IN MR. RUSCILLI'S CONCLUSION TO ISSUE 11, HE ASKS THE**
13 **COMMISSION TO FIND IT TO BE INAPPROPRIATE FOR XO TO**
14 **REQUIRE A SECURITY DEPOSIT "JUST BECAUSE" BELLSOUTH**
15 **REQUIRES A SECURITY DEPOSIT OF XO. DOES THAT**
16 **ACCURATELY REFLECT WHY XO WOULD SEEK A SECURITY**
17 **DEPOSIT FROM BELLSOUTH?**

18 **A: No. As I stated in my direct testimony, XO believes that BellSouth should**
19 **have to abide by the same security and credit policy as BellSouth imposes**
20 **on XO. That does not mean XO would request the same deposit that**
21 **BellSouth requests. It does not necessarily mean that XO would request**
22 **any security deposit. However, if BellSouth's policy is fair, it should be**
23 **willing to abide by the same terms of that policy. During negotiations, XO**

1 repeatedly raised this fairness issue. However, BellSouth still has not
2 indicated why it is unwilling to abide by the same policy.

3 **Q: WHAT DOES XO REQUEST THE COMMISSION TO FIND ON**
4 **ISSUE 11?**

5 **A:** XO requests the Commission find that BellSouth must abide by the same
6 credit and security policy that it imposes on ALECs.

7 **Q: DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

8 **A:** Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Rebuttal Testimony of John Seaton on behalf of XO Florida, Inc. has been furnished by (*) hand delivery or by U. S. Mail on this 26th day of March, 2002, to the following:

(*) Jason Fudge
Florida Public Service Commission
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Tallahassee, Florida 32399

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BellSouth Telecommunications, Inc.
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Atlanta, Georgia 30375

(*) James Meza
C/o Nancy Sims
BellSouth Telecommunications, Inc.
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