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April 23, 2002

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

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Re: Docket No. 011119-TP (XO Florida)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to XO Florida Inc.'s Motion to File Supplemental Testimony, 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 shown on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

Patrick W. Turner (KA)

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

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CERTIFICATE OF SERVICE
Docket No. 011119-TP

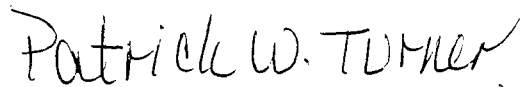
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and U.S. Mail this 23rd day of April, 2002 to the following:

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(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by XO Florida,) Docket No. 011119-TP
Inc. for arbitration of)
Unresolved issues with BellSouth)
Telecommunications, Inc.)
_____) Filed: April 23, 2002

**BellSouth Telecommunications, Inc.’s Response to
XO Florida, Inc.’s Motion to File Supplemental Testimony**

BellSouth Telecommunications, Inc. (“BellSouth”) respectfully submits its Response to the Motion to File Supplemental Testimony that XO Florida, Inc. (“XO”) filed on April 16, 2002.

BellSouth objects to XO’s request to file the “supplemental” testimony of Rex Knowles that is attached to XO’s Motion. The parties conducted discovery concerning the issue addressed by that testimony, and XO did not produce the information that is the subject of Mr. Knowles’ testimony to BellSouth until April 8, 2002 – after it had filed both its direct and rebuttal testimony in this docket. See Motion at ¶3. Nothing in XO’s motion suggests that the information addressed in Mr. Knowles’ “supplemental” testimony was unavailable either at the time XO served its original responses to BellSouth’s discovery requests or when XO filed Mr. Knowles’ Rebuttal Testimony on March 26, 2002. XO, therefore, has shown no reason why it should be allowed to “supplement” its testimony outside the deadlines set forth in the Order Establishing Procedure with testimony that addresses information that was available to it as of those deadlines.

Under the circumstances of this docket, however, BellSouth has no objection to XO’s alternative suggestion of entering XO’s amended response to Interrogatory No. 19 into the record

as a stipulated exhibit, so long as BellSouth is allowed to cross-examine XO's witnesses regarding this amended response during the hearing.¹

Respectfully submitted this 23rd day of April, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

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¹ As XO notes, the letter accompanying this submission asks if BellSouth would agree to enter the information attached to Mr. Knowles' testimony into the record as a stipulated exhibit. See Motion at 2, n.1. Before BellSouth was able to respond to this request, XO filed the its Motion to Submit Supplemental Testimony. BellSouth, is unaware of XO's contacting any counsel for BellSouth regarding its Motion.