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November 5, 2002

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 110
Betty Easley Conference Center
Tallahassee, FL 32399-0850

VIA HAND DELIVERY

Re: Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of AT&T Communications of the Southern States, LLC, TCG South Florida and AT&T Broadband Phone of Florida, LCC (formerly known as MediaOne Florida Telecommunications, Inc.) ("AT&T") are the original and fifteen copies of AT&T's Response in Opposition to Verizon's November 24, 2002 Filing.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Martin P. McDonnell (handwritten signature)

Martin P. McDonnell

AUS
CAF
CMP
COM
CTR
ECR
GGL
OPC
MMS
SEC
OTH
MPM/rl

Enclosures

cc: All Parties of Record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE

12129 NOV-5 02

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into appropriate methods to )  
compensate carriers for exchange of traffic subject )  
to Section 251 of the Telecommunications Act of )  
1996 )  
\_\_\_\_\_ )

Docket No. 000075-TP (Phase IIA)

Filed: November 5, 2002

**RESPONSE OF AT&T IN OPPOSITION TO  
VERIZON'S NOVEMBER 24, 2002 FILING**

Comes now AT&T Communications of the Southern States, LLC, TCG of South Florida and AT&T Broadband Phone of Florida, LCC (formerly known as MediaOne Florida Telecommunications, Inc.) (collectively "AT&T"), by and through undersigned counsel, and hereby responds in opposition to Verizon's October 24, 2002 filing. In support therefor, AT&T states as follows:

1. On October 24, 2002, Verizon filed in this docket a letter addressed to Ms. Blanca Bayo, which enclosed copies of a staff arbitrator's recommended decision to the Rhode Island Public Utilities Commission. In the letter, Verizon stated that "we are bringing this recommended decision to the attention of the Commission and its Staff because it is particularly enlightening with regard to the Commission's reconsideration of its decision to assess reciprocal compensation on the basis of the originating carrier's retail local calling area."

2. While the Commission has no rules or procedures for filing notices of supplemental authority, the Commission has stated that "a notice of supplemental authority drawing our attention to authority newly discovered and devoid of argument would be properly received." Order No. PSC-97-0283-FOF-WS. AT&T notes, however, that the document provided by Verizon is not "supplemental authority." Rather, the document is a preliminary recommended decision made to the Rhode Island PUC by a single member of its staff. As noted in the document (pp. 41-42), it is

DOCUMENT NUMBER-DATE

12129 NOV-5 02

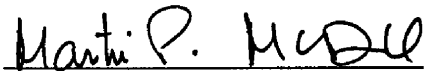
FPSC-COMMISSION CLERK

also subject to requests for clarification, comments, and reply comments.

3. It appears that Verizon wishes the Commission to note that a member of the Rhode Island PUC staff, acting as an arbitrator, disagreed with the Commission's recent Order in this docket. The Commission previously rejected the same arguments with which the Rhode Island staff member agreed, and the recommended decision provides no additional analysis or insight. The Commission therefore should disregard the recommended decision as irrelevant and lacking any authoritative stature.

WHEREFORE, AT&T respectfully requests that the Commission disregard the recommended decision provided by Verizon.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 5<sup>th</sup> day of November, 2002:

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