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LAW OFFICES
Messer, Caparello & Self
A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

July 8, 2003

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COMMISSION
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BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RE: Docket No. 981834TP

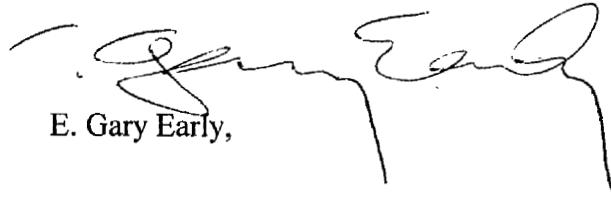
Dear Ms. Bayó:

Enclosed for filing in the above referenced docket, is an original and 15 copies of the AT&T Response to Bellsouth Telecommunications Joint Motion to Strike.

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

Thank you for your assistance with this filing.

Sincerely yours,



E. Gary Early,

FRS/amb
Enclosures
cc: Parties of Record

- AUS _____
- CAF _____
- CMP _____
- COM 5
- CTR _____
- ECR _____
- GCL _____
- OPC _____
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- SEC 1
- OTH _____

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DOCUMENT NUMBER - 0011
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers)
for Commission action to support local)
competition in BellSouth)
Telecommunications, Inc.'s service)
territory)

Docket No. 981834-TP

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for generic)
investigation to ensure that BellSouth)
Telecommunications, Inc., Sprint-Florida,)
Incorporated, and GTE Florida Incorporated)
comply with obligation to provide alternative)
local exchange carriers with flexible, timely,)
and cost-efficient physical collocation.)

Docket No. 990321-TP
Filed: July 8, 2003

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
RESPONSE TO BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO
JOINT MOTION OF VERIZON FLORIDA INC. AND SPRINT-FLORIDA, INC. TO
STRIKE THE REVISED REBUTTAL TESTIMONY OF STEVEN E. TURNER
AND THE SURREBUTTAL TESTIMONY OF JEFFREY A. KING**

AT&T Communications of the Southern States, LLC (hereinafter "AT&T"), pursuant to Rule 28-106.204, Fla. Admin. Code, hereby responds to the document entitled BellSouth Telecommunications, Inc.'s Response to Joint Motion of Verizon Florida Inc. and Sprint-Florida, Incorporated to Strike the Revised Rebuttal Testimony of Steven E. Turner and the Surrebuttal Testimony of Jeffrey A. King, requests that the Commission deny the relief sought, and states:

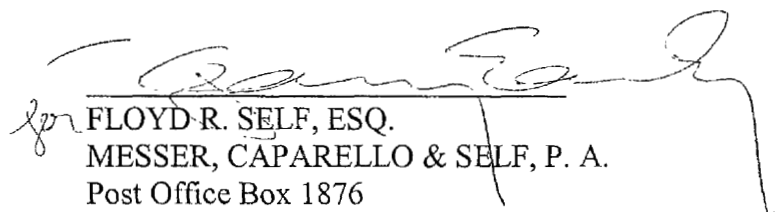
1. In its pleading, BellSouth has erroneously styled its pleading as a "Response" to the Verizon Florida Inc. (hereinafter "Verizon") and Sprint-Florida, Incorporated (hereinafter "Sprint"), Joint Motion to Strike. However, the pleading requests affirmative relief in the form of an Order striking revised rebuttal and surrebuttal testimony, and goes beyond that sought by Verizon and Sprint by seeking sanctions against AT&T. Through its agreement with the

Verizon/Sprint Joint Motion, the BellSouth "Response" is not a document "in opposition" to the Verizon/Sprint Motion, as required by Rule 28-106.204(1), F.A.C., and is therefore not a response at all. As such, the BellSouth "Response" violates the uniform rules and is improperly submitted.

2. To the extent the Commission decides to consider the entirely duplicative "Response" filed by BellSouth, AT&T hereby adopts and incorporates its July 2, 2003 Response to the Verizon/Sprint Joint Motion as though fully set forth herein.

WHEREFORE for the reasons set forth herein and, as requested in the July 2, 2003 Response to the Verizon/Sprint Joint Motion to Strike, the Commission should deny the Verizon/Sprint Joint Motion, should proceed to a determination of the merits of this proceeding based on all of the information available to it, and should enter a Final Order that is most protective of the consumers of the State of Florida.

Respectfully Submitted.


for FLOYD R. SELF, ESQ.
MESSER, CAPARELLO & SELF, P. A.
Post Office Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720

and

Tracy W. Hatch, Esq.
AT&T Communications of the Southern
States, LLC
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301
(850) 425-6360
Attorneys for AT&T Communications of the
Southern States, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 8th day of July, 2003.

Beth Keating, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Virginia Tate, Esq.
AT&T
1200 Peachtree St., Suite 8068
Atlanta, GA 30309

Ms. Lisa Riley
AT&T
1200 Peachtree St., Suite 8068
Atlanta, GA 30309

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Jeffrey Whalen, Esq.
John Fons, Esq.
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302

Mr. Terry Monroe
Ms. Genevieve Morelli
CompTel
1900 M Street, NW, Suite 800
Washington, DC 20036

William H. Weber
Senior Counsel
Covad Communications Company
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309

Mr. Robert Waldschmidt
Howell & Fisher
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201-1107

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue
Tallahassee, FL 32301

Vicki Kaufman, Esq.
Joe McGlothlin, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

Susan S. Masterton, Esq.
Charles J. Rehwinkel, Esq.
Sprint Communications Company Limited
Partnership
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214

Matthew Feil, Esq.
Florida Digital Network, Inc.
390 North Orange Avenue, Suite 2000
Orlando, Florida 32801

Mr. David Tobin
Tobin & Reyes
7251 West Palmetto Park Road, #205
Boca Raton, FL 33433-3487

Richard D. Melson
Hopping Green Sams & Smith, P.A.
P.O. Box 6526
Tallahassee, FL 32314

Ms. Nanette S. Edwards
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802-4343

Donna McNulty, Esq.
WorldCom
1203 Governors Square Blvd, Suite 201
Tallahassee, FL 32301-2960

Mr. John D. McLaughlin, Jr.
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, GA 30043-8119

Ms. Deborah Eversole, General Counsel
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602

Marilyn H. Ash
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, NV 89129

Mr. Don Sussman
Network Access Solutions Corporation
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

Kenneth A. Hoffman, Esq.
Rutledge Law Firm
P.O. Box 551
Tallahassee, FL 32302-0551

Rodney L. Joyce
Shook, Hardy & Bacon LLP
600 14th Street, NW, Suite 800
Washington, DC 20005-2004

Charles J. Rehwinkel
Sprint-Florida, Incorporated
MC FLTHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

Mark Buechele
Supra Telecom
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32301

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

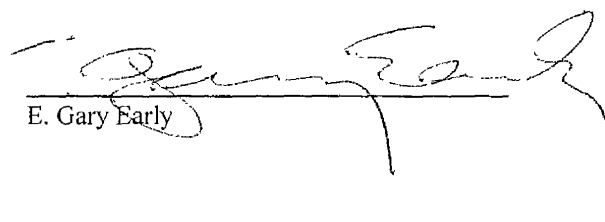
Mr. David Christian
Verizon Florida, Inc.
106 East College Avenue, Suite 810
Tallahassee, FL 32301-7704

Kimberly Caswell
Verizon Select Services
P.O. Box 110 (FLTC0007)
Tampa, FL 33601-0110

Daniel McCuaig, Esq.
Wilmer Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420

Nanette Edwards, Esq.
ITC^DeltaCom Communications, Inc.
4092.S. Memorial Parkway
Huntsville, AL 35802

Tracy W. Hatch, Esq.
AT&T Communications of the Southern States, LLC
101 N. Monroe Street, Suite 701
Tallahassee, FL 32301



E. Gary Early