

ORIGINAL

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November 12, 2003

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

COMMISSION  
CLERK

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Re: Docket No. 001503-TP (Number Pooling Trials)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Protest of Public Counsel, 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.

RECEIVED & FILED

lh

FPSC-BUREAU OF RECORDS

Sincerely,

*Nancy B. White*

Nancy B. White

(KA)

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

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CAF \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**  
**Docket No. 001503-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 12th day of November, 2003 to the following:

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Nancy B. White (KA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Cost Recovery and )  
Allocation of Issues for Number ) Docket No. 001503-TP  
Pooling Trials in Florida )  
\_\_\_\_\_ ) Filed: November 12, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
RESPONSE TO PROTEST OF PUBLIC COUNSEL**

Pursuant to the Florida Administrative Code and Florida Statutes, BellSouth Telecommunications, Inc. ("BellSouth") files its response to the Protest filed by the Office of Public Counsel ("OPC") in the above captioned matter. Specifically, BellSouth states the following:

1. Paragraph 1 does not require a response from BellSouth.
2. BellSouth admits the allegations of Paragraph 2.
3. BellSouth denies the allegations of Paragraph 3.
4. BellSouth admits the allegations of Paragraph 4.
5. BellSouth is without sufficient information to admit or deny the

allegations of Paragraph 5.

6. BellSouth admits the allegations of Paragraph 6.
7. BellSouth denies the allegations of Paragraph 7.
8. BellSouth denies the allegations of Paragraph 8 and submits that

the following are the appropriate disputed issues:

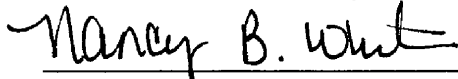
- a. What authority was granted to the Florida Public Service Commission by FCC Order No. 99-249?
- b. What number pooling cost recovery requirements were set forth by the FCC?
- c. What number pooling cost recovery requirements were


set forth by the Florida Public Service Commission?

- d. What is the basis of authority under which the Florida Public Service Commission allowed BellSouth to recover the costs of number pooling?
- e. Is the manner by which the Florida Public Service Commission allowed BellSouth to recover the costs of number pooling consistent with FCC policy?
- f. Would BellSouth have incurred number pooling costs without state-mandated number pooling?

WHEREFORE, BellSouth prays that the Commission enter judgment in its favor and against OPC, denying the relief requested by OPC in the Protest and for all other relief deemed appropriate under law.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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