

ORIGINAL

Matilda Sanders

From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.com]
Sent: Friday, July 09, 2004 11:54 AM
To: Filings@psc.state.fl.us
Cc: Nancy Sims; Fatool, Vicki; Holland, Robyn P.; Linda Hobbs; Meza, James
Subject: Docket 980119-TP
Importance: High

- A. **Brenda Slaughter**
 Legal Secretary for James Meza III
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
 Tallahassee, Florida 32301-1558
 (404) 335-0714
brenda.slaughter@bellsouth.com
- B. Docket No. 980119-TP: Complaint of Supra Telecommunications & Information Systems, Inc. against BellSouth Telecommunications, Inc. for violation of the Telecommunications Act of 1996; petition for resolution of disputes as to implementation and interpretation of interconnection, resale and collocation agreements; and petition for emergency relief
- C. BellSouth Telecommunications, Inc.
 on behalf of James Meza III
- D. 7 pages total (PDF with signatures)
 5 pages WORD (in lieu of disk)
- E. BellSouth Telecommunications, Inc.'s Prehearing Statement

Brenda Slaughter (on behalf of James Meza III)
 BellSouth Telecommunications, Inc.
 Suite 4300 - Legal Department

CMP
COM 675 W. Peachtree Street
CTR Atlanta, GA 30375-0001
ECR Phone: (404) 335-0714

GCL _____

OPC <<980119-TP BellSouth Prehearing.pdf>> <<980119-TP Prehearing Statement.doc>>

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Legal Department

James Meza III
Attorney

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July 9, 2004

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

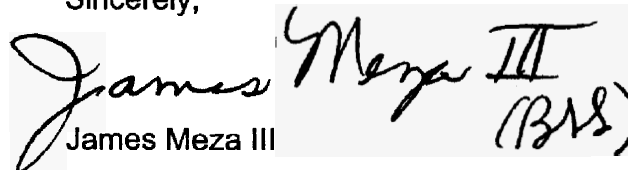
Re: **Docket No. 980119-TP (Supra Complaint)**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Prehearing Statement, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


James Meza III (BMS)

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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FPSC-COMMISSION CLFRK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications)	Docket No.: 980119-TP
and Information Systems, Inc., Against)	
BellSouth Telecommunications, Inc.)	
<hr/>) Filed: July 9, 2004

PREHEARING STATEMENT OF BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-04-0120-PCO-TP) issued on February 3, 2004, and the subsequent Joint Motion for Extension of Time to file the Prehearing Statement filed on July 7, 2004, hereby submits its Prehearing Statement for Docket No. 980119-TP.

A. Witnesses

BellSouth proposes to call the following witness to offer testimony on the issues in this docket:

<u>Witness</u>	<u>Issue(s)</u>
Ron Pate (Direct and Rebuttal)	All issues

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct and rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on July 19, 2004. BellSouth has listed the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

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B. Exhibits

Ron Pate (Rebuttal):

RMP-1	Diagram of Process Flow for Ordering
RMP-2	Table indicating reject timeline results for the first quarter of 2004 for the state of Florida as well as for Supra (public and confidential version filed)

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

The simple question of this proceeding is whether BellSouth timely complied with the Commission's Orders regarding on-line edit checking capability. As found by the Commission in Order No. PSC-03-1178-PAA-TP, the answer is an unequivocal yes. BellSouth has provided Supra with on-line edit capability since July 1998 for ED1, since November 1998 with TAG, and since January 2000 with LENS. Further, the KPMG Third Party Test successfully tested the CLECs' ability to develop and implement a machine to machine interface using BellSouth's business rules, thus proving that BellSouth provides nondiscriminatory access to its OSS. Implicit with a machine to machine interface is the capability to program up-front on-line edits tailored to meet a CLEC's unique needs.

D. BellSouth's Position on the Issues

Issue 1: What did the Florida Public Service Commission Order regarding on-line edit checking capability in this docket?

Position: The Commission ordered BellSouth to provide the same on-line edit checking **capability** to Supra that occurred when BellSouth's retail ordering interfaces interacted with BellSouth's FUEL and SOLAR databases by December 31, 1998. The Commission further held that BellSouth was not required to duplicate its RNS and DOE interfaces for Supra or install hardware at Supra's premises.

Issue 2: Has on-line edit capability been made available in the manner required by the Commission's prior orders in this docket?

Position: Yes. BellSouth timely complied with the Commission's orders regarding on-line edit checking capability by providing CLECs with access to the same SOER edits BellSouth uses to process its retail orders since July 1998. Accordingly, CLECs had the same on-line edit checking capability that BellSouth's retail interfaces have since July 1998 for EDI, since November 1998 for TAG, and since January 2000 for LENS.

Issue 3: Did the third party test performed by KPMG in Docket Nos. 960786 and 981834 resolve any issues in this proceeding?

Position: Yes. The KPMG Third Party Test proved that BellSouth provides nondiscriminatory access to its OSS, which means that BellSouth wholesale OSS functions in the same time and manner as BellSouth's retail systems. Further, the Third

Party Test proved that CLECs could develop and implement a machine to machine interface using BellSouth's business rules, which would allow a CLEC to program up-front on-line edits.

Issue 4: **Has BellSouth timely complied with the Commission's previous orders in this docket?**

Position: Yes. BellSouth has timely complied with the Commissions Orders in this proceeding since July 1998 for EDI, November 1998 for TAG, and January 2000 for LENS.

E. Stipulations

None.

F. Pending Motions

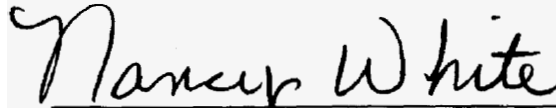
None.


I. Confidentiality Motions

Pursuant to Supra's statement that it does not consider the subject information confidential, BellSouth will withdraw its Request for Confidential Classification filed on May 26, 2004.

Respectfully submitted this 9th day of July, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.


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**CERTIFICATE OF SERVICE
Docket No. 980119-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 9th day of July, 2004 to the following:

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