

NANCY B. WHITE
General Counsel - FL

BellSouth Telecommunications, Inc.
150 South Monroe Street
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April 18, 2005

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

Re: Docket No. 050194-TL: Complaint by Florida BellSouth customers who paid fees to BellSouth Telecommunications, Inc. related to Miami-Dade County Ordinance Section 21-44 ("Manhole Ordinance") and request that Florida Public Service Commission order BellSouth to comply with Section A.2.4.6 of General Subscriber Service Tariff and refund all fees collected in violation thereof.

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Request for Oral Argument, 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,


Nancy B. White

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

CERTIFICATE OF SERVICE
Docket No. 050194-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

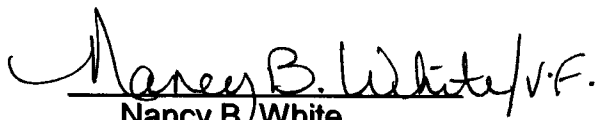
(*) Federal Express and First Class U. S. Mail this 18th day of April, 2005 to the
following:

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Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Florida BellSouth) Docket No. 050194-TL
customers who paid fees to BellSouth)
Telecommunications, Inc. related to)
Miami-Dade County Ordinance Section)
21-44 ("Manhole Ordinance") and)
request that Florida Public Service)
Commission order BellSouth to comply)
with Section A.2.4.6 of General)
Subscriber Service Tariff and refund all)
fees collected in violation thereof.)
_____) Filed: April 18, 2005

REQUEST FOR ORAL ARGUMENT

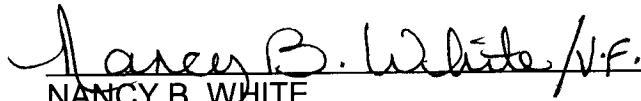
Pursuant to Rule 25-22.058, Florida Administrative Code, BellSouth Telecommunications, Inc. ("BellSouth") respectfully requests oral argument on its Motion to Dismiss the "Complaint of Florida BellSouth Customers Against BellSouth Telecommunications, Inc. and Request for Relief" ("Complaint").

The Complaint presents the Commission with several threshold jurisdictional issues. In addition to the standing of individual petitioners, the Complaint raises issues related to the Commission's ability to entertain a class action, provide injunctive relief, and award attorney fees. BellSouth believes oral argument on these legal issues would assist the Commission in evaluating these matters.

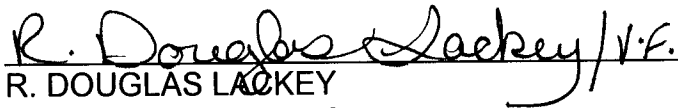
For the reasons expressed, BellSouth respectfully requests oral argument on its Motion to Dismiss.

Respectfully submitted this 18th day of April, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

/V.F.

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/V.F.

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