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> > March 7, 1997

GARY K. HUNTER, JR. JONATHAN T. JOHNSON ROBERT A. MANNING ANGELA R. MORRISON GARY V. PERKO KAREN M. PETERSON R. SCOTT RUTH W. STEVE SYNES T. KENT WETHERELL, II

OF COUNSEL W. ROBERT FOKES

Ms. Blanca S. Bayó Director, Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket Nos. 960846-TP, 960916

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. in the above docket are the original and 15 copies of MCI's Response to BellSouth's Motion for Extension of Time to File Interconnection Agreement.

By copy of this letter, this document has been provided to the parties on the attached service list.

> Very truly yours, Nie D. M

Richard D. Melson

ATP ATP CAT RDM/CC CAT Enclosures CAT CAT Enclosures CAT CAT Enclosures

101

DOCUMENT FUMBER-DATE 02487 MAR-75 FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)	
Communications of the Southern)	Docket No. 960833-TP
States, Inc., MCI)	Docket No. 960846-TP
Telecommunications Corporation,	and)	
MCI Metro Access Transmission)	
Services, Inc.,)	
for arbitration of certain terms	3)	
and conditions of a proposed)	Filed: March 7, 1997
agreement with BellSouth)	
Telecommunications, Inc.)	
concerning interconnection and)	
resale under the)	
Telecommunications Act of 1996.)	

MCI'S RESPONSE TO BELLSOUTH'S MOTION FOR EXTENSION OF TIME TO FILE INTERCONNECTION AGREEMENT

MCImetro Access Transmission Services, Inc. and MCI Telecommunications Corporation (collectively, "MCI") hereby respond to BellSouth's Motion for Extension of Time to File Interconnection Agreement.

 On February 21, 1997, the Commission disposed of BellSouth's and AT&T's motions for reconsideration of Order No.
 PSC-96-1579-FOF-TP (Arbitration Order) and resolved the disputed contract provisions in the agreements filed by BellSouth and MCI.

2. At that time, the Commission also approved the staff's verbal recommendation that the parties be required to submit a final contract incorporating the Commission's decisions within two weeks from the date of the vote, or by March 7, 1997.

3. While there was considerable discussion by the Commission of the staff's recommendation, MCI believes that the

DOCUMENT NUMBER-DATE 02487 MAR-75 FPSC-RECORDS/REPORTING77

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Commission's rulings on the motions for reconsideration and the disputed contract language, as reflected in the motions adopted by the Commission, are clear. MCI has worked with BellSouth to finalize the contract language, and believes that the parties have developed language that accurately reflects the Commission's decisions.

4. MCI has two local switches in place in Florida. Further delay in finalizing the arbitrated agreement will have an adverse impact on MCI's entry into the local markets and will provide BellSouth with an additional time period during which it continues to be sheltered from competition. MCI therefore opposes BellSouth's motion for extension of time.

5. BellSouth has refused to finalize the arbitrated agreement unless and until there is an affirmative decision of the Commission denying its motion for extension of time. MCI therefore urges the Commission to act as quickly as possible to deny BellSouth's request.

6. In the event the Commission determines that the filing deadline should be extended until after the issuance of an order reflecting the decisions made on February 21, 1997, MCI opposes allowing an additional two weeks after that date to make the requisite filing. MCI believes that the Commission's decisions have already been accurately incorporated in the current draft of the agreement based on the results of the agenda conference, and that the additional effort (if any) required to make the

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agreement conform to the Commission's order could be finished in five business days or less following issuance of the order.

WHEREFORE, MCI urges that BellSouth's motion for extension of time be denied. In the event any extension is granted, MCI urges that the period of extension be made as short as possible, and not extend for two weeks beyond the date of entry of the Commission's order on reconsideration.

RESPECTFULLY SUBMITTED this 7th day of March, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

By: New O. Me

Richard D. Melson P.O. Box 6526 Tallahassee, FL 32314 (904) 425-2313

and

MARTHA MCMILLIN MCI Telecommunications Corporation 780 Johnson Ferry Road, Suite 700 Atlanta, GA 30342 (404) 843-6375

ATTORNEYS FOR MCI

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 7th day of March, 1997.

Monica Barone Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

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Floyd R. Self
Norman H. Horton, Jr.
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ho D. Me

Attorney

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