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March 9, 1998

Mrs. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Dear Mrs. Bayo:

Re: Docket No. 971056-TX

You will find enclosed an original and fifteen (15) copies of AT&T's Response to BellSouth BSE's Motion to Dismiss for filing in the above-referenced docket.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

Marsha E. Rule

ACK _____

AFA 1 _____

APP _____

CAF _____ mr

CMU 2 Enclosures

cc: Parties of Record

CTR _____

EAG _____

LEG 2 _____

LIN 5 _____

OPC _____

RCH _____

SEC 1 _____

WAS _____

OTH _____

DOCUMENT NUMBER-DATE

02961 MAR -98

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate)
to provide alternative local)
exchange telecommunications)
service by BellSouth BSE, Inc.)

Docket No. 971056-TX

Filed: March 9, 1998

AT&T's RESPONSE TO
BELLSOUTH BSE'S MOTION TO DISMISS

Pursuant to Rule 25-22.037, Florida Administrative Code, AT&T Communications of the Southern States, Inc. (AT&T) hereby submits its response in opposition to BellSouth BSE's Motion to Dismiss AT&T's Petition to Intervene. In support, AT&T states as follows:

1. AT&T is holds interexchange company and ALEC certification in Florida. Further, AT&T is signatory to an approved interconnection agreement with BellSouth Telecommunications, Inc., the parent company of BellSouth BSE. AT&T intends to compete with BellSouth Telecommunications, Inc. and BellSouth BSE, as well as to purchase services from BellSouth Telecommunications, Inc. Further, AT&T has taken substantial steps toward such competition.

2. In its Motion to Dismiss AT&T's Petition to Intervene, BellSouth BSE restates the same arguments it made in response to the Petitions on Proposed Agency Action filed by the Florida Competitive Carriers Association (FCCA) and MCI/MCIMetro. These same arguments were again raised in response to Petitions to Intervene filed by Time Warner and TCG South Florida. Curiously, however, BellSouth BSE made no such objections when MCI and AT&T, among many others, intervened in

DOCUMENT NUMBER-DATE

02961 MAR-98

FPSC-RECORDS/REPORTING

Georgia PSC Docket No. 8042-U, In re: BellSouth BSE, Inc. Application for Certificate of Authority to Provide Local Exchange Telephone Service.

3. Previous intervenors in this case have ably refuted the arguments raised by BellSouth BSE in its Motion to Dismiss, and have clearly explained the reasons that competitors such as AT&T have standing to protest Order No. PSC-97-1347-FOR-TX and thus, to intervene in this action. Rather than restate such arguments, AT&T hereby adopts by reference and incorporates herein the Response to BellSouth BSE's Motion to Dismiss filed in this docket by FCCA on December 12, 1997.

WHEREFORE, AT&T respectfully requests that this Commission dismiss the motion to dismiss filed by BellSouth BSE and grant AT&T's petition to intervene in this docket.



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COMMUNICATIONS OF THE
SOUTHERN STATES, INC.

CERTIFICATE OF SERVICE
Docket No. 971056-TX

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
U.S. Mail this 9th day of March, 1998, to the following:

Martha Carter-Brown
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 390-M
Tallahassee, FL 32399-0850

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c/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

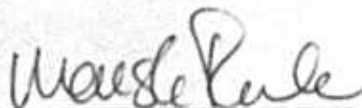
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