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ORIGINAL

April 3, 1998

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

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

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion to Strike Portions of Supra Telecommunications and Information Systems, Inc.'s Direct Testimony, which we ask that you file in the captioned matter.

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.

Sincerely,

*Nancy B. White*  
(b)(1)

Nancy B. White

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Suriani
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- LIN 3
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03879 APR-3 98

FPSC RECORDS/REPORTING

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served  
by Federal Express this 3rd day of April, 1998 to the following:

Beth Keating  
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Nancy B. White (DN)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications ) Docket No.: 980119-TP  
and Information Systems, Inc., Against )  
BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: April 3, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
MOTION TO STRIKE PORTIONS OF SUPRA  
TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S  
DIRECT TESTIMONY**

BellSouth Telecommunications, Inc., ("BellSouth"), hereby files, pursuant to Rule 25-22.037(2)(b), Florida Administrative Code, its Motion to Strike Portions of Supra Telecommunications and Information Systems, Inc.'s ("Supra") Direct Testimony and, in support thereof, states the following:

1. On March 24, 1998, the Prehearing Officer issued Order No. PSC-98-0416-PCO-TP, holding that certain issues proposed by Supra were inappropriate and would be excluded. The excluded issues related to whether BellSouth had violated the Act by failing to negotiate in good faith; whether BellSouth had failed to give Supra access to unbundled network elements at parity; whether BellSouth was required to resell its billing services to Supra; and whether BellSouth was required to provide dark fiber to Supra.

2. On March 25, 1998, Supra filed the direct testimony of Olukayode A. Ramos. Mr. Ramos' testimony contains discussions of the excluded issues, specifically, page 5, line 1 through page 7, line 11; page 9, lines 7-9; page 38, lines 24-26; and page 39, line 18 through page 40, line 1.

3. These sections of Mr. Ramos' testimony, along with the exhibits referenced therein (Exhibits OAR-1; OAR-2 and OAR-3), should be stricken as irrelevant to the issues that are the subject of this docket.

WHEREFORE, BellSouth respectfully requests the Commission to strike Portions of Supra's Direct Testimony as irrelevant to the issues in this docket.

Respectfully submitted this 3rd day of April, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY

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c/o Nancy H. Sims

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