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January 27, 1999

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

Re. Docket No. 980770-T1

Dear Mrs. Bayo:

Enclosed for filing in the above-referenced docket, please find an original and fifteen (15) copies of the Statement of AT&T Communications of the Southern States, Inc. in Support of Its Proposed Issues.

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

Thank you for your assistance with this matter.

ACK _____

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Yours truly,

Tracy Hatch
Tracy Hatch

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of AT&T Communications Of the Southern)
 States, Inc. For Modification of BellSouth)
 Telecommunications, Inc.'s policies regarding the)
 porting of Direct-In-Dial Numbers)
 _____)

Docket No. 980770-TL

Filed: January 27, 1998

Statement of AT&T Communications of the Southern States, Inc.In Support of Its Proposed Issues

AT&T Communications of the Southern States, Inc.'s requests in this proceeding arise from BellSouth Telecommunications, Inc.'s activities involving number portability and AT&T's attempts to have certain of its local customers' Direct-In-Dial (DID) telephone numbers "ported" from BellSouth to AT&T's facilities. DID service is typically offered in conjunction with the provision of PBX trunks. DID service allows an outside party's call to be routed by a PBX directly to a particular station line served by that PBX. DID numbers are typically provisioned in specific groups or blocks. In order for the local service of a customer with DID numbers to be transferred to AT&T, some or all of the DID numbers must be ported to AT&T.

AT&T is beginning to provide local exchange service in Florida. In some cases, the customer is willing to subscribe to AT&T's local service but out of caution uses AT&T for only a portion of its total local service needs. When this happens, those telephone numbers associated with the service being provided by AT&T must be ported to AT&T. For large customers utilizing a PEX and obtaining DID service from BellSouth, a portion of the customer's DID numbers must be ported to AT&T. When a customer splits its local service

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between BellSouth and AT&T, some of the customer's DID number blocks must be split and the AT&T portion ported from BellSouth to AT&T. In order to port less than a full block of twenty numbers, BellSouth deems it necessary to reconfigure those DID numbers remaining in the block that were not ported.

At the time that AT&T's petition was filed, Section A12.7.1 of BellSouth's tariffs required that DID numbers would only be provided in blocks of twenty numbers. The tariffs did not allow for a DID block of less than twenty. In order to port less than a full block of twenty DID numbers, BellSouth deems it necessary to reconfigure the remaining DID numbers in a block that are not ported. In order to accomplish this reconfiguration, BellSouth required AT&T to enter into a special assembly when it ported less than a full block of DID numbers. The special assembly provided, *inter alia*, that the existing recurring rate for a DID block would be prorated among the individual DID numbers in the block and assessed for each number whether ported or not. In addition, BellSouth imposed a nonrecurring charge of \$2.20 for each DID number in the block.

AT&T's petition initiating this proceeding is based on the inherent unfairness and anticompetitive effects of imposing charges on AT&T, or worse, AT&T's customer because the customer opted to choose AT&T for a portion of its local service. The imposition of a special assembly charge, recurring and nonrecurring charges simply for porting less than a full block of DID numbers is a competitive penalty on AT&T and its customers.

On December 17, 1998, BellSouth filed revisions to its DID tariff to allow for the provision of nonconsecutive DID numbers. Essentially, it allows for the provision of DID numbers in a block of less than twenty. The tariff revisions also eliminate the special assembly charge and clarify that the recurring and nonrecurring charges are imposed only for

each DID number in a block that is not ported. While the tariff has improved the situation, there still remains the imposition of nonrecurring charges on AT&T or AT&T's customers solely because the customer ported a portion of its DID numbers to AT&T.

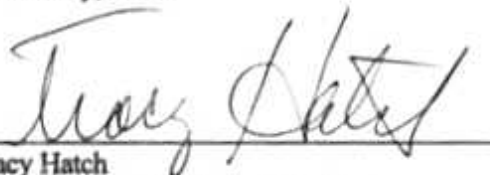
To address these problems, AT&T proposes the following issues:

1. When a DID customer ports less than a block of twenty DID numbers to a CLEC, what are the appropriate nonrecurring charges for the DID numbers not ported?
2. When nonrecurring charges are assessed on unported DID numbers as a result of porting less than a full block, who should be billed?

While the tariff has ameliorated some of the concern that AT&T has with BellSouth's behavior, the tariff has not eliminated all of the problems identified in the complaint. As discussed above, the issues proposed by AT&T in this proceeding are narrowly tailored and specific to the anticompetitive behavior described in the petition that still remains even after the filing of the DID tariff revisions in December.

Accordingly, AT&T requests that the Prehearing Officer approve the issues as framed above.

Respectfully submitted this 27th day of January, 1999.



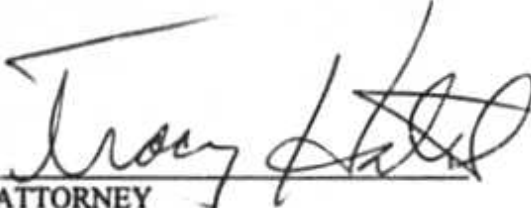
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**CERTIFICATE OF SERVICE
DOCKET 980770-TI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished
via Hand Delivery to the following parties of record on this 27th day of January,
1999:

Beth Keating
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy B. White,
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556


ATTORNEY