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Legal Department

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General Counsel - Florida

99 JUN 17 PM 4:36

BellSouth Telecommunications, Inc.
150 South Monroe Street
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RECORDS AND
REPORTING

June 17 1999

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. 990694-TL (Expanded Lifeline)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to the Joint Petition to Expand Lifeline Assistance Plan Eligibility, which we ask that you file in the above-referenced 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.

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FPSC-BUREAU OF RECORDS

Sincerely,

Nancy B. White (KE)

Nancy B. White

cc: All Parties of Record
Marshall M. Criser III
William J. Ellenberg II

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS? _____
- OPC _____
- RRR _____
- SEC _____
- WAW _____
- OTH _____

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**CERTIFICATE OF SERVICE
Docket No. 990694-TL**

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

U.S. Mail this 17th day of June, 1999 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Robert Butterworth
Department of Legal Affairs
The Capitol
Tallahassee, FL 32301

Florida Cable Telecomm. Assoc.
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Tallahassee, FL 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

Nancy B. White (re)
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition to Expand Lifeline)
Assistance Plan Eligibility Criteria)
_____)

Docket No. 990694-TL
Filed: June 17, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE TO THE JOINT PETITION TO EXPAND
LIFELINE ASSISTANCE PLAN ELIGIBILITY CRITERIA**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files its Response, pursuant to Rule 1.110, Florida Rules of Civil Procedure and Rule 28-106.203, Florida Administrative Code, to the Joint Petition of the Office of Public Counsel, the Attorney General of the State of Florida and the American Association of Retired Persons (collectively "Joint Petitioners"). In support thereof, BellSouth states the following:

1. BellSouth is without information sufficient to formulate a response to Paragraph 1 of the Petition, and, therefore, denies the allegations contained therein.
2. BellSouth is without information sufficient to formulate a response to Paragraph 2 of the Petition, and, therefore, denies the allegations contained therein.
3. BellSouth is without information sufficient to formulate a response to Paragraph 3 of the Petition, and, therefore, denies the allegations contained therein.

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4. BellSouth denies the allegations contained in Paragraph 4 of the Petition and avers that disputed issues of material fact are raised by the Petition.

5. BellSouth admits that Lifeline Assistance Plans are allowed by state and federal law, that the amounts provided by law are as cited, and that the terms of the state and federal laws speak for themselves. BellSouth is without information sufficient to formulate a response to the remaining allegations of Paragraph 5 of the Petition.

6. BellSouth avers that the terms of state law, federal regulations and Commission orders cited speak for themselves and is without information sufficient to formulate a response to the remaining allegations of Paragraph 6 of the Petition.

7. BellSouth is without information sufficient to formulate a response to the allegations of Paragraph 7 of the Petition, and, therefore, denies the allegations contained therein.

8. BellSouth is without information sufficient to formulate a response to the allegations concerning companies other than BellSouth and denies the remaining allegations of Paragraph 8 of the Petition.

9. BellSouth avers that the terms of the FCC order speak for themselves and denies the remaining allegations of Paragraph 9 of the Petition.

10. BellSouth is without information sufficient to formulate a response to Paragraph 10 of the Petition, and, therefore, denies the allegations contained therein.

11. BellSouth is without information sufficient to formulate a response to Paragraph 11 of the Petition, and, therefore, denies the allegations contained therein.

12. BellSouth is without information sufficient to formulate a response to Paragraph 12 of the Petition, and, therefore, denies the allegations contained therein.

And now, BellSouth further avers:

13. BellSouth supports the Lifeline Assistance Plans and is in compliance with all state and federal requirements.

14. BellSouth does not deny Lifeline service for unpaid long distance charges.

15. Toll blocking will not act as a deterrent to high local service bills.

16. The proposal by the Joint Petitioners will increase fraud and bad debt.

17. BellSouth is entitled to be paid for services rendered to customers.

18. BellSouth opposes the proposal of Joint Petitioners.

WHEREFORE, BellSouth respectfully requests that the Joint Petition be denied.

Respectfully submitted this 17th day of June, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KR)

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