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ORIGINAL

RECORDS AND
REPORTING

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September 2, 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. 991037-TP (Orlando Telephone Company)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Answer and Response to the Petition of Orlando Telephone Company, 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.

Sincerely,

Michael P. Goggin (P.W.)

Michael P. Goggin

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

AFA _____
APP _____
CAE _____
CML *Jaw* _____
CTR _____
EAG _____
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MAS _____
OPC _____
PAI _____
SEC I _____
WAW _____
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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 991037-TP

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

U.S. Mail this 2nd day of September, 1999 to the following:

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

Mr. Steve Argalas
Orlando Telephone Company
4558 S.W. 35th Street
Suite 100
Orlando, FL 32811-6541
Tel. No. (407) 996-8900
Fax. No. (407) 996-8901

Sprint-Florida, Inc.
Mr. F. B. (Ben) Poag
P.O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214
Tel. No. (850) 599-1027
Fax. No. (407) 814-5700

Charles J. Rehwinkel
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MC FLTLHO0107
Tallahassee, FL 32301-2214
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Michael P. Goggin (m)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Orlando Telephone Company)
to compel Sprint-Florida, Incorporated)
and BellSouth Telecommunications, Inc.,)
to accept its White Page Directory Listing)
and Directory Assistance Information orders.)
_____)

Docket No. 991037-TP

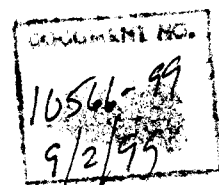
Filed: September 2, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
ANSWER AND RESPONSE TO PETITION
OF ORLANDO TELEPHONE COMPANY**

BellSouth Telecommunications, Inc., ("BellSouth"), hereby files its Answer and Response, pursuant to Rules 1.100, 1.110 and 1.140 of the Florida Rules of Civil Procedure and Rule 28-106.203 of the Florida Administrative Code, to the Petition of Orlando Telephone Company ("OTC")¹ and states as follows:

1. BellSouth is without sufficient knowledge to admit or deny, and therefore denies the allegations in Paragraph 1 of OTC's Petition that business practices of BellSouth and Sprint are adversely affecting the competitive position of OTC or any other ALEC, or that any practices are having a "serious negative impact" on "all subscribers, both business and residence." OTC's requests that its Petition be accepted as a formal protest and for an expedited hearing are not assertions of fact and

¹ This docket was opened after OTC filed a letter of protest with the Commission on July 28, 1999. The letter was later served on BellSouth. As a procedural matter, the letter likely should be treated as a petition under Rule 28-106.201 of the Florida Administrative Code. Accordingly, BellSouth believes it is appropriate to respond to the letter with this answer. A reference in this answer to "Paragraph 1 of OTC's Petition," for example, shall refer to the first paragraph of text in OTC's July 28 letter.



require no response. Any remaining allegations in Paragraph 1 of OTC's petition are denied.

2. BellSouth admits that, for some period of time until June of 1999, Sprint provided BellSouth with directory assistance listings for subscribers of telephone service in certain specified NPA/NXXs in the portion of the Orlando metropolitan area served by Sprint. BellSouth also admits that in June of 1999 Sprint stopped providing these listings to BellSouth. BellSouth further admits that in most cases, these listings were available to BellSouth directory assistance operators within 48 hours of the time BellSouth received them from Sprint. BellSouth denies the remaining allegations in Paragraph 2 of the Petition.

3. Upon information and belief, BellSouth admits that its affiliate, BellSouth Advertising and Publishing Company ("BAPCO") obtained white pages directory listing information from Sprint for certain NPA/NXXs in Sprint's service area in the Orlando metropolitan area in or about May 1999. Upon information and belief, BellSouth admits that BAPCO closed its White Pages directory on or about July 22, 1999 and that BAPCO plans to distribute the directory in November 1999. BellSouth is without sufficient knowledge to admit or deny, and therefore denies, the allegation in Paragraph 3 of the Petition that Sprint plans to obtain white pages information from BellSouth in August for a directory that will be distributed in December. BellSouth denies the remaining allegations in Paragraph 3 of the Petition.

4. BellSouth admits that it accepts directory listing information from ALECs serving customers within BellSouth's service area. BellSouth is without sufficient knowledge to admit or deny, and therefore denies, the allegations in Paragraph 4 of the petition relating to Sprint's policies for accepting directory listing information. BellSouth denies the remaining allegations in Paragraph 4 of the Petition.

5. BellSouth admits that BellSouth and Sprint may negotiate and agree on whether they wish to exchange directory listing information and on what terms. BellSouth is without knowledge to admit or deny, and therefore denies, the allegation in Paragraph 5 of the Petition that Sprint has violated its agreement with OTC. BellSouth denies the remaining allegations in Paragraph 5 of the Petition.

6. BellSouth admits that Attachment 2 to the Petition includes excerpts from a current agreement between OTC and BellSouth and that the agreement speaks for itself. BellSouth is without sufficient knowledge to admit or deny, and therefore denies, the remaining allegations of Paragraph 6 of the Petition.

7. Paragraph 7 of the Petition includes legal arguments to which no response is required. To the extent that Paragraph 7 includes any factual allegations, they are denied.

WHEREFORE, having fully answered the allegations raised in the Petition, BellSouth respectfully requests that the Petition of Orlando Telephone Company be dismissed as OTC is not entitled to the relief sought.

Respectfully submitted this 2nd day of September, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (BW)
MICHAEL P. GOGGIN

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