E. EARL EDENFIELD, Jr. General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0763

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. 991947-TP (Florida Telephone Services Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of the Pre-hearing Statement of BellSouth Telecommunications, Inc. We ask that you file this item in the captioned docket.

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,

E. Earl Edenfield, Jr. (PW)

E. Earl Eden Field h.

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

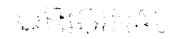
RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03989 MAR 308

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



In re:)	Docket No. 991947-TP
Petition for Arbitration of the Interconnection)	
Agreement Between BellSouth Telecommunications,)	
Inc. and Florida Telephone Services, LLC)	
Pursuant to the Telecommunications Act of 1996.)	Filed: March 30, 2000
)	

PRE-HEARING STATEMENT OF BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in accordance with the provisions of the Order Establishing Procedure, (Order No. PSC-00-0390-PCO-TP) issued February 23, 2000, submits its Pre-hearing Statement.

Witnesses

BellSouth proposes to call the following witnesses to offer testimony on the issue in this docket, as enumerated in Appendix A of the Order Establishing Procedure:

	Witness	Issue
1.	Alphonso Varner (Direct)	1
2.	Daonne Caldwell (Direct)	1

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Pre-hearing Officer at the Pre-hearing Conference to be held on April 6, 2000. BellSouth has listed the witnesses for whom BellSouth filed testimony, but reserves the right to supplement that list if necessary.

DOGUMENT NUMBER-DATE
03989 MAR 308

FPSC-RECORDS/REPORTING

Exhibits

1. Daonne D. Caldwell (DDC-1)

OSS Cost Studies

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

Statement of Basic Position

The issue in this docket represents a specific dispute between BellSouth and Florida Telephone Services, LLC ("FTS") as to what should be included in the Interconnection Agreement between the parties. BellSouth's position is more consistent with the 1996 Act, the pertinent rulings of the FCC and the rules of this Commission. Therefore, the Commission should sustain BellSouth's position.

BellSouth's Position on the Issues of Law and Fact

<u>Issue 1</u>: What are the appropriate rates to be charged by BellSouth for Florida Telephone Services' access to and use of the electronic and manual interfaces to BellSouth's OSS and functions?

Position: The 1996 Act and the FCC's rules allow BellSouth to recover costs associated with developing, providing, and maintaining the electronic and manual interfaces to allow ALECs, such as FTS, to access BellSouth's OSS. Although the Florida Public Service Commission has not decided the issue, eight state commissions in BellSouth's region have recognized BellSouth's right to recover such costs. BellSouth is proposing rates for electronic and manual access calculated consistent with the cost methodology previously adopted by the Commission.

Stipulations

None

Pending Motions

None.

Other Requirements

None.

Respectfully submitted this 30th day of March 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5558

R. DOUGLAS LACKEY

E. EARL EDENFIELD JR.

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0763

201811

CERTIFICATE OF SERVICE DOCKET NO. 991947-TP

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

U.S. Mail this 30th day of March 2000 on the following:

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

Paul B. Joachim Florida Telephone Services 696 East Altamonte Drive Suite 4 Altamonte Springs, FL 32701 Phone No. 407-331-8622 Fax No. 407-331-9427

E. Earl Edenfield Jr. (BW)