

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

ORIGINAL

)
In Re: Complaint of Supra Telecommunications
& Information Systems against BellSouth
Telecommunications, Inc. for violation of
the Telecommunications Act of 1996; petition
for resolution of disputes as to implementation
and interpretation of interconnection, resale
and collocation agreements; petition for
emergency relief.
)

) Docket No.: 980119-TP

) Dated: June 27, 2000

**SUPRA TELECOM'S REQUEST FOR ORAL ARGUMENT
ON BELLSOUTH'S MOTION FOR RECONSIDERATION**

SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC. ("Supra Telecom"), by and through its undersigned counsel and pursuant to Rule 25-22.058, Florida Administrative Code, hereby files this Motion for Oral Argument on BELLSOUTH TELECOMMUNICATIONS INC.'S Motion for Reconsideration (dated June 8, 2000), and in support thereof states as follows:

1. In July 1998, this Commission ordered BellSouth to modify its ALEC ordering interfaces to provide the same on-line edit checking capability made available to BellSouth's retail operations. Since that time BellSouth has been stalling and delaying this requirement through a series of requests to this Commission and a withdrawn appeal before the United States District Court for the Northern District of Florida ("Federal Court").

2. On February 11, 2000, this Commission ruled that BellSouth had not complied with the July 1998 Order, yet raised the issue that a full evidentiary hearing might show changed circumstances and substantial compliance. Based upon this indication, BellSouth delayed any

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ruling on its appeal to the Federal Court by seeking a voluntarily dismissal without prejudice on the grounds that BellSouth was going to seek a hearing before this Commission on substantial compliance. Apparently, after obtaining the dismissal without prejudice from the Federal Court, BellSouth changed its mind about seeking a hearing on the issue of compliance.

3. BellSouth's current motion does not seek a hearing on substantial compliance, but rather seeks to indefinitely postpone such a hearing until completion of the Master Test Plan on BellSouth's OSS (which might take years).

4. BellSouth has not provided parity in on-line edit checking capability and is playing games with this Commission and Supra Telecom as to the definition and meaning of on-line checking capability. Supra Telecom is currently experiencing horrific ordering problems with BellSouth due to orders being rejected for one reason or another after those orders have passed through the ALEC ordering interfaces; which are supposed to allow the ALEC to perfect the orders before submitting the same to avoid these delay problems. More than fifty percent of Supra Telecom's recent orders are taking BellSouth more than two weeks to convert on basic residential customers; with some orders taking more than a month. These problems arise from the fact that the ordering interface (i.e. LENS 99) does not provide BellSouth's own employees sufficient information which they claim is needed to process the order; thus throwing a majority of Supra Telecom's simple conversion orders into a BellSouth created "limbo" which has resulted in the loss of approximately twenty percent of all conversion orders. In the last few weeks, Supra Telecom has lost hundreds of customers due to BellSouth's ordering problems.

5. To Supra Telecom, BellSouth is simply trying to delay and hide exposure of the

horrific potential problems existing in the current ordering interfaces. BellSouth also simply wants to avoid having to provide true parity in OSS and on-line edit checking capability for several more years, thus preventing any real competition for a few more years.

6. Supra Telecom and other ALECs cannot survive if BellSouth is allowed to continue playing this delay game.

7. Accordingly, the issue of BellSouth's compliance with the on-line edit checking capability requirement is of supreme importance to Supra Telecom. Accordingly, Supra Telecom requests oral argument on BellSouth's instant request to effectively delay for years the resolution of a Commission order which is already almost two years old. Because of the potential harm to Supra Telecom arising from a summary disposition of this matter, Supra Telecom strongly believes that oral argument is necessary and appropriate.

WHEREFORE, SUPRA TELECOMMUNICATION & INFORMATION SYSTEMS, INC., respectfully requests the Commission to grant oral argument on BELLSOUTH TELECOMMUNICATIONS INC.'S Motion for Reconsideration (dated June 8, 2000).

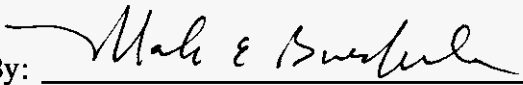
Respectfully Submitted this 27th day of June, 2000.

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By: 
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CERTIFICATE OF SERVICE

I HEREBY Certify that a true and correct copy of the foregoing has been furnished by U.S. Mail upon NANCY WHITE, ESQ. (Attorney For BellSouth), 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301; BETH KEATING, ESQ. (FPSC Staff), 2540 Shumard Oak Boulevard, Tallahassee, Florida; and AMANDA GRANT, BellSouth Telecommunications, Inc., Regulatory & External Affairs, 675 West Peachtree Street, N.E., Room 38L64, Atlanta, Georgia 30375; this 27th day of June, 2000.

By: 
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