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Legal Department

NANCY B. WHITE  
General Counsel-Florida

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BellSouth Telecommunications, Inc.  
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RECORDS AND  
REPORTING

November 6, 1998

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. 980800-TP (Supra Collocation)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Oral Argument, which we asked that you file in the captioned 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.

RECEIVED & FILED

Sincerely,

*[Signature]*  
FPSC-BUREAU OF RECORDS

*Nancy B. White*  
Nancy B. White (pw)

- ACK  NBW/vf
- AFA \_\_\_\_\_ Enclosure
- APP \_\_\_\_\_
- CAF \_\_\_\_\_ cc: All parties of record
- CMU  A. M. Lombardo
- CTR \_\_\_\_\_ R. G. Beatty
- EAG \_\_\_\_\_ William J. Ellenberg II
- LEG 1
- LIN 3
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

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FPSC-RECORDS/REPORTING

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**CERTIFICATE OF SERVICE**  
**Docket No. 980800-TP**

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

\* Federal Express and U.S. Mail this 6th day of November, 1998 to the following:

Beth Keating, Esq. \*  
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Amanda Grant  
BellSouth Telecommunications, Inc.  
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\_\_\_\_\_  
Nancy B. White (BWL)

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of Supra ) Docket No. 980800-TP  
Telecommunications and Information )  
Systems, Inc., Against BellSouth )  
Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: November 6, 1998

**BellSouth Telecommunications Inc.'s  
Motion for Oral Argument**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.058(1), Florida Administrative Code, hereby files its Motion For Oral Argument. In support thereof, BellSouth states the following:

1. On November 6, 1998, BellSouth filed its Motion For Reconsideration By the Full Commission of Order No. PSC-98-1417-PCO-TP, issued on October 22, 1998.
2. Oral argument is vital on the Motion because of the precedent setting nature of the issue involved. The issue involves the interpretation and implementation of 47 C.F.R. §51. 323(f)(1), the "first come-first served" rule of physical collocation. This is a case of first impression in Florida that will affect the implementation of the Telecommunications Act of 1996.
3. Although the Order sets forth the panel's belief that the specific situation is unique and not likely to recur, BellSouth's Motion for Reconsideration sets for the reasons why that belief is not correct. Due to the importance of this issue to both BellSouth and ALECs and due to the impact on competition, BellSouth believes oral argument is necessary. The full Commission must have

a complete understanding of the circumstances in order to render a decision on BellSouth's Motion for Reconsideration.

WHEREFORE, BellSouth respectfully requests that oral argument on its Motion for Reconsideration be granted.

Respectfully submitted this 6th day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE

c/o Nancy Sims

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