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Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990649-TP
Investigation into Pricing of Unbundled Network Elements

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's Answer to BellSouth Telecommunications, Inc.'s Motion to Include Issues in Issues List for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
Pricing of Unbundled Network)
Elements)
_____)

Docket No. 990649-TP
Filed: February 16, 2000

ORIGINAL

**GTE FLORIDA INCORPORATED'S ANSWER TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION TO INCLUDE ISSUES IN ISSUES LIST**

GTE Florida Incorporated (GTE) opposes BellSouth Telecommunications, Inc.'s (BellSouth) Motion to Include Issues in Issues List, filed by BellSouth on February 4, 2000. BellSouth seeks to include in this proceeding issues that will require a decision as to how to price various collocation types and elements. As BellSouth points out, the Commission Staff has opposed inclusion of these issues in this case. (BellSouth Motion at 1.) To this end, Staff has pointed out that a decision in the Commission's generic collocation proceeding (990321-TP/981834-TP) is pending. GTE agrees with Staff that, without knowing what collocation requirements will apply, it would be infeasible to try to resolve collocation pricing in this docket.

BellSouth is incorrect in stating that adding its five proposed collocation issues "will not result in hardship to any party." (BellSouth Motion at 2.) GTE has a collocation tariff that took effect last month. This tariff, of course, includes a pricing structure for collocation elements. A generic consideration of collocation pricing structure, as BellSouth suggests, would be at odds with GTE's specific tariff filing.

In addition, GTE will be prejudiced by addition of the proposed issues because such action would require GTE to complete yet additional cost studies

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on an expedited basis. This is already a very complex proceeding, requiring numerous, detailed cost studies. Requiring GTE to complete additional studies, which GTE had no reason to expect would be included in this docket, will unduly tax GTE's already overburdened resources.

GTE believes that BellSouth wishes to add collocation pricing issues, at least in part, because the collocation elements at issue may be required for BellSouth to obtain section 271 relief. (See BellSouth Motion at 2.) GTE thus suggests that a BellSouth-specific docket is a better place for resolution of the issues BellSouth raises. BellSouth will not be prejudiced by consideration of these issues in a docket separate from this one.

Respectfully submitted on February 16, 2000.

By: *Ernesto Maza Jr. for*
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Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Answer to BellSouth Telecommunications, Inc.'s Motion to Include Issues in Issues List in Docket No. 990649-TP were sent via U. S. mail on February 16, 2000 to the parties on the attached list.



Kimberly Caswell

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