

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T)
 Communications of the Southern)
 States, Inc. for arbitration of) Docket No. 960833-TP
 certain terms and conditions of)
 a proposed agreement with) Filed: 2/23/1997
 BellSouth Telecommunications,)
 Inc. concerning interconnection)
 and resale under the)
 telecommunications act of 1996.)
 _____)

In re: Petition by MCI)
 Telecommunications Corporation)
 and MCI Metro Access Transmission) Docket No. 960846-TP
 Services, Inc. for arbitration of)
 certain terms and conditions of a)
 proposed agreement with BellSouth)
 Telecommunications, Inc.)
 concerning interconnection and)
 resale under the)
 Telecommunications Act of 1996.)
 _____)

In re: Petition by Metropolitan)
 Fiber Systems of Florida, Inc.)
 for arbitration with BellSouth) Docket No. 960757-TP
 Telecommunications, Inc.)
 concerning interconnection rates,)
 terms, and conditions, pursuant)
 to the Federal Telecommunications)
 Act of 1996.)
 _____)

ACK _____
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 LEG 2
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 SEC 1
 WAS _____
 OTH _____

**AT&T'S RESPONSE AND OBJECTIONS TO BELLSOUTH'S NOTICE
 AND REQUEST FOR APPROVAL OF BELLSOUTH'S
 INTERPRETATION OF ORDER NO. PSC-96-1579-FOF-TL**

AT&T Communications of the Southern States,
 Inc. (hereinafter "AT&T"), hereby responds to BellSouth
 Telecommunications, Inc.'s request for approval by the
 Florida Public Commission (hereinafter "Commission") of

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proposal has any objective verifiable guidelines that would enable a CLEC to accurately determine when an application was "acceptable" to BellSouth. Apparently, an application is acceptable only when BellSouth determines it is acceptable. BellSouth can control the start date simply by finding errors and rejecting the application seeking more information.

5. Some of the individual timelines for the individual activities on Exhibit A appear longer than necessary to accomplish the identified task. For example, thirty days for review of the initial application appears too long, particularly in view of the number of collocation requests identified by BellSouth. Fifteen days would be more reasonable.

6. BellSouth seeks to have the timeclock stop when a request for a building permit is submitted. In support of this delay, BellSouth cites the problems encountered with building permits in the wake of Hurricane Andrew in South Florida. It not clear whether the problems with building permits identified by BellSouth would apply to types of activity necessitated by a collocation arrangement. Moreover, it does not appear that the problems, if any, in South Florida, should be or could be applied to the rest of the state. A more detailed inquiry of building code

BellSouth's interpretation of that portion of Order No. PSC-96-1579-FOF-TP relating to the time period for the completion of physical collocation arrangements for AT&T. In support thereof, AT&T states:

1. AT&T agrees that, by Order No. PSC-96-1579-FOF-TP (PSC-96-1579), the Commission required that physical collocation be provided within three months for "ordinary conditions."

2. AT&T also agrees that the Commission held in Order No. PSC-97-1459-FOF-TP that BellSouth had not demonstrated why it could not meet the timeframes set by the Commission.

3. As a result, BellSouth has asked the Commission to define several terms to allow BellSouth to complete collocations ostensibly within the "three month" time frame - when the clock starts and stops and what constitutes "ordinary conditions."

4. With respect to BellSouth's requested definition of the starting point, BellSouth's proposal creates a number of serious questions about what the actual total amount of time would be required to obtain a physical collocation arrangement. For example, delaying the start date creates a number of questions regarding what constitutes an "acceptable" application for collocation. It is not clear that BellSouth's

officials statewide should be conducted before the conclusion BellSouth advocates can be accepted.

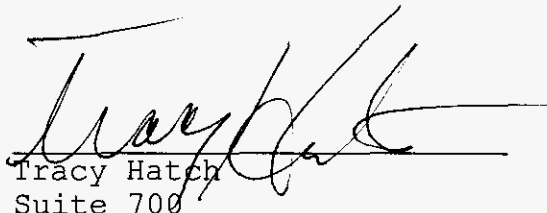
7. BellSouth also proposes a definition of "ordinary conditions." BellSouth defines ordinary conditions as where the space is available and only minor changes are required to the network or building infrastructure. Initially, it appears that BellSouth's view of ordinary conditions would exclude the majority of BellSouth's approximately 193 central offices in Florida. Unless BellSouth has embarked on a project to make all its central offices available to collocation in anticipation of a request, based on the number of collocation projects listed, it is clear the most of BellSouth's central offices would not fall within BellSouth's definition of ordinary conditions. BellSouth makes no proposal as to a timeline for those central offices that would not qualify as "ordinary conditions."

8. As can be seen from the above, BellSouth's proposal seeks to engraft new and previously unknown requirements on the Commission's established timeline for implementing a physical collocation arrangement. This proposal will subject CLECs to delays in achieving collocation far beyond those envisioned by the Commission. Accordingly, it is

imperative that BellSouth's proposal be subject to a detailed investigation as well as an opportunity for a hearing.

WHEREFORE AT&T requests the Commission to conduct a detailed investigation to determine the appropriate detailed timelines that will be consistent with Order No. 96-1579 and subject any such detailed timelines to an appropriate opportunity for hearing.

Respectfully submitted this 23rd day of February, 1998.

A handwritten signature in black ink, appearing to read "Tracy Hatch", is written over a horizontal line. The signature is fluid and cursive.

Tracy Hatch
Suite 700
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Attorney for AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC.

CERTIFICATE OF SERVICE

Dockets Nos. 960833-TP, 860757-TP and 960847-TP

I HEREBY CERTIFY that a true and correct copy of the forgoing has been furnished by U.S. Mail or hand-delivery to the following parties of record this 23^d day of February, 1998:

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