

NANCY B. WHITE  
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BellSouth Telecommunications, Inc.  
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April 10, 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. 980119-TP (Supra Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Prehearing Statement, which we ask 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.

Sincerely,

*Nancy B. White (KE)*

Nancy B. White

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU *Saranni*
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2 cc: All parties of record
- LIN 3 A. M. Lombardo
- OPC \_\_\_\_\_ R. G. Beatty
- RCH \_\_\_\_\_ William J. Ellenberg II
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

DOCUMENT NUMBER-DATE

04133 APR 10 98

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 980119-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served  
by Federal Express this 10th day of April, 1998 to the following:

Beth Keating  
Legal Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

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Nancy B. White (KR)  
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications ) Docket No.: 980119-TP  
 and Information Systems, Inc., Against )  
 BellSouth Telecommunications, Inc. )  
 \_\_\_\_\_ ) Filed: April 10, 1998

**PREHEARING STATEMENT OF  
 BELLSOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with the Order Establishing Procedure (Order No. PSC-98-0323-PCO-TP), issued January 14, 1998 and the Order on Disputed Issues (Order No. PSC-98-0416-PCO-TP), issued on March 24, 1998, hereby submits its Prehearing Statement for Docket No. 980119-TP.

**A. Witnesses**

BellSouth proposes to call the following witnesses to offer direct testimony on the issues in this docket:

<b><u>Witness</u></b>	<b><u>Issue(s)</u></b>
Patrick C. Finlen (Direct)	2, 3, 4, 5, and 6
W. Keith Milner (Direct)	1

Rebuttal testimony is due in this matter on April 15, 1998. Concurrent with the filing of its rebuttal testimony, BellSouth will file an amended witness and exhibit list for the prehearing order.

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 Prehearing Officer at the prehearing conference to be held on April 17, 1998.

**B. Exhibits**

Patrick C. Finlen	PCF-1	Pages from BellSouth Interconnection Services Website
	PCF-2	Attachment 7 of the BellSouth-Supra Interconnection Agreement
	PCF-3	October 6, 1997 letter from R. J. Campbell
W. Keith Milner	None	

BellSouth reserves the right to file exhibits to any additional testimony that may be filed under the circumstances identified in Section "A" 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.

**C. Statement of Basic Position**

On November 24, 1997, BellSouth and Supra filed a request for approval of a resale, interconnection, and unbundling agreement under the Act. The agreement covers a two-year period and governs the relationship between BellSouth and Supra regarding resale, unbundling, and interconnection pursuant to the Act. On February 3, 1998, this Commission approved the BellSouth-Supra

Agreement in Order No. PSC-98-0206-FOF-TP. The Commission found that the agreement complied with the Telecommunications Act of 1996.

BellSouth has used its best efforts to assist Supra in implementing the various provisions of the agreements. BellSouth has made a good faith effort to comply with all the requirements and obligations of the BellSouth-Supra Interconnection Agreement. BellSouth is fully committed to continue, cooperative efforts.

#### **D. BellSouth's Position on the Issues**

**Issue No. 1: Has BST failed to properly implement the following provisions of its Interconnection, Collocation and Resale agreements with Supra such that Supra is able to provide local exchange service on parity with that which BellSouth provides:**

- a. Billing requirements;**
- b. telephone number access;**
- c. provision of dial tone;**
- d. Electronic access to Operations Support Systems (OSS) and OSS interfaces (Ordering and provisioning, Installation, maintenance and repair);**
- e. Notification requirements;**
- f. timeliness of installation, repair, and maintenance.**

- Position:**
- a. No. BellSouth has provided Supra with the information needed by Supra in order to bill its customers.**
  - b. No. BellSouth has provided Supra with access to telephone numbers available at parity with itself.**
  - c. No. BellSouth is aware of one incident in which the dial tone for Supra's corporate offices was disconnected as a result of a location move by Supra. The cause was human error.**

- d. No. BellSouth has provided Supra access to BellSouth's Operations Support Systems.
- e. No. BellSouth notifies all ALECs of changes in its Operational Support Systems via written notification and BellSouth's Interconnection Services Website.
- f. No. BellSouth has provided Supra with timely provisioning, maintenance, and repair services.

**Issue No. 2: Has BellSouth provided adequate written rules, regulations, codes, instructions, descriptions of procedures, other written materials, technical guidance, and actual support service, or made any modifications of procedures, if necessary, in timely fashion, to permit Supra to understand and utilize effectively BellSouth's procedures for billing, ordering, provisioning, installation, repair, etc., that are essential to Supra's ability to provide local exchange service on parity with BellSouth?**

**Position:** Yes. BellSouth has provided Supra with sufficient information for Supra to provide local exchange service on parity with BellSouth.

**Issue No. 3: Has BellSouth acted appropriately in its billing of Supra and has Supra timely paid its bills to BellSouth?**

**Position:** BellSouth has billed Supra in an appropriate fashion. Supra has a history of untimely payment of those bills.

**Issue No. 4: Has BellSouth appropriately applied Sections A2.3.8A and A2.3.8B of its General Subscriber Services Tariff to Supra?**

Position: Yes. BellSouth appropriately applied the tariff sections to Supra in an appropriate manner.

**Issue No. 5: Has BellSouth responded appropriately to consumer queries regarding Supra?**

Position: Yes. BellSouth has responded reasonably and responsibly to consumer queries regarding Supra.

**Issue No. 6: What relief, if any, should the Commission order for Supra or BellSouth?**

Position: The Commission should order no relief for Supra and should order Supra to pay BellSouth's bill in a timely manner.

#### **E. Stipulations**

There are no stipulations of which BellSouth is aware.

#### **F. Pending Motions**

BellSouth's Motion to Strike Portions of Supra's Amended Direct Testimony filed on April 9, 1998.

BellSouth's Motion to Strike Portions of Supra's Direct Testimony filed on  
April 3, 1998.

**G. Other Requirements**

BellSouth knows of no requirement set forth in any prehearing order with  
which it cannot comply.

Respectfully submitted this 10th day of April, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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