

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Supra Telecommunications and Information Systems, Inc., 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; and petition for emergency relief.) Docket No. 980119-TP
) Filed: August 18, 1998

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SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.
RESPONSE TO BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR RECONSIDERATION AND CLARIFICATION
OF ORDER NO. PSC-98-1001-FOF-TP

Supra Telecommunications and Information Systems, Inc., ("Supra") hereby files this Response to BellSouth Telecommunications, Inc.'s ("BellSouth's") Motion for Reconsideration and Clarification of Order No. PSC-98-1001-FOF-TP ("the Order") issued July 22, 1998. Pursuant to Florida Public Service Commission ("the Commission" or the "FPSC" hereafter) Rule 25-22.060, Florida Administrative Code, Supra moves the Commission to deny BellSouth's Motion for Reconsideration and Clarification. BellSouth's Motion for Reconsideration and Clarification asserts that there was no issue identified in this

proceeding addressing "online edit checking capability." Supra must respectfully disagree. Issue No. 1 in this proceeding was identified in Prehearing Order No. PSC-98-0576-PHO-TP, issued April 24, 1998, as follows:

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1
- LIN 3
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Issue No. 1: Has BellSouth Telecommunications, Inc., failed to properly implement the following provisions of its Resale, Collocation, and Interconnection Agreements with Supra such that Supra is able

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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 Operational Support Systems (OSS) and OSS interfaces (Ordering and Provisioning, Installation, Maintenance and Repair);
- e. Notification requirements;
- f. Timeliness of installation, repair and maintenance.

The position on Issue No. 1 provided in Prehearing Order No. PSC-98-0576-PHO-TP by Supra is as follows:

**Position: Yes, BellSouth has failed to properly implement the provisions of the Resale, Collocation and Interconnection Agreements with Supra, referenced in sub-issues (a) through (f) above, such that Supra can provide levels of customer service equivalent to that which BellSouth provides.

It is clear from the wording of Issue No. 1 and the position of Supra that BellSouth had notice that all issues related to BellSouth's operational support systems (OSS) and the electronic interfaces provided for access to BellSouth's OSS for Supra would be at issue in the proceeding. The fact that Supra could not perform the same type of online edit checking that BellSouth's employees could perform was a recurring theme throughout the proceeding, including during the depositions of witness Stacy and other BellSouth employees. BellSouth's own Motion for Reconsideration and Clarification states that Mr. Ramos testified for Supra that "he wanted the exact same systems as BellSouth." It was obvious in Mr. Ramos' testimony that the reason he wanted BellSouth's exact same systems was that the access to BellSouth's operational support systems that had been provided to Supra was

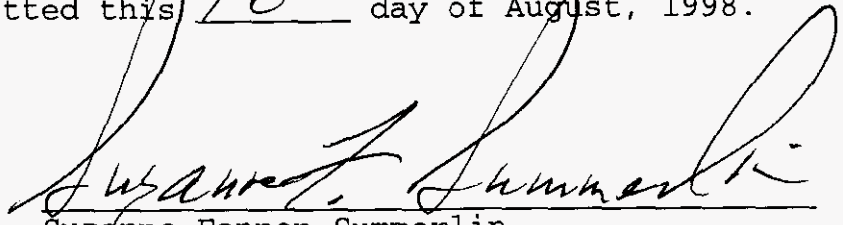
completely inadequate. The evidence in the record, including the transcripts of the depositions of BellSouth's employees that did not testify at the hearing, made it clear that online edit checking capability was critical for Supra and that the lack of such capability was one major reason why Supra's access to BellSouth's operational support systems was so inadequate. BellSouth's witness Stacy testified regarding the adequacy of BellSouth's electronic interfaces and his opinion that Supra should not require any further improvements.

The simple fact is that BellSouth did not put on the type of case on this issue that it now believes it should have and wishes to have the Commission change the rules of the game for it. The Commission repeated throughout its Order in this proceeding that it did not have enough evidence to make a decision in Supra's favor on one issue after another. It is not appropriate to reconsider the Commission's decision on this issue because BellSouth cries foul as a result of BellSouth's own choices and decisions during this proceeding regarding the evidence it put on.

Supra has submitted this Response to BellSouth's Motion for Reconsideration and Clarification within the twelve days normally provided for responses to motions that are served by U.S. Mail (seven days plus five for mailing.) However, Supra has just realized that it inadvertently overlooked the fact that BellSouth had served its Motion for Reconsideration and Clarification by hand delivery. Supra would respectfully request that the Commission accept this Motion for Reconsideration and

Clarification even though it technically should have been filed earlier.

Respectfully submitted this 18th day of August, 1998.



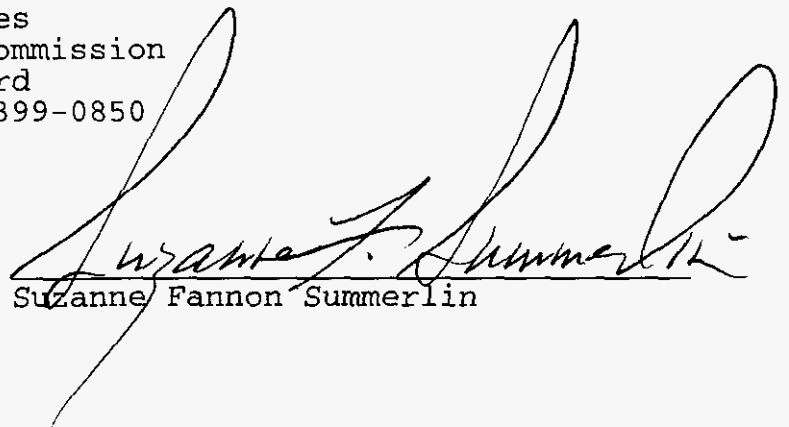
Suzanne Fannon Summerlin
Attorney for Supra Telecommunications
and Information Systems, Inc.
1311-B Paul Russell Road, Suite 201
Tallahassee, Florida 32301
(904) 656-2288
Florida Bar No. 398586

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand delivery to the following parties of record this 18th day of August, 1998:

BellSouth Telecommunications, Inc.
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301

Beth Keating, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Suzanne Fannon Summerlin