Legal Department

NANCY B. WHITE Assistant General Counsel-Florida

GRIGINAL

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

September 9, 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-TR (Supra Complaint) and Docket No. 980800-TP (Supra Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Supra Telecommunications and Information Systems, Inc.'s Motion for Oral Argument and BellSouth's Motion for Oral Argument, which we ask that you file in the captioned docket.

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 Nancy B. White

cc: All parties of record A. M. Lombardo R. G. Beatty William J. Ellenberg II

> DOCUMENT HE HERR-DATE 09835 SEP-98

## CERTIFICATE OF SERVICE Docket No. 980800-TP

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

Federal Express this 9th day of September, 1998 to the following:

Beth Keating, Esq. Staff Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 (850) 413-6199

Suzanne Fannon Summerlin, Esq. Supra Telecommunications and Information Systems, Inc. 1311-B Paul Russell Rd., #201 Tallahassee, Florida 32301 Tel. No. (850) 656-2288 Fax. No. (850) 656-5589

Supra Telecommunications and Information Systems, Inc. 2620 S.W. 27th Avenue Miami, FL 33133 Tel. No. (305) 476-4220 Fax. No. (305) 476-4282

Amanda Grant BellSouth Telecommunications, Inc. Regulatory & External Affairs 675 West Peachtree Street, N.E. Room 38L64 Atlanta, Georgia 30375

Nancy B. White ( And)

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications and Information Systems, Inc., Against BellSouth Telecommunications, Inc.	) Docket No.: 980119-TP ) ) )
In Re: Petition for Emergency Relief of Supra Telecommunications and Information Systems, Inc., Against BellSouth Telecommunications, Inc.	)Docket No. 980800-TP ) ) )
- -	) Filed: September 9, 1998

## BellSouth's Response to Supra's Motion for Oral Argument and BellSouth's Motion for Oral Argument

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files its

Response to Supra Telecommunications and Information Systems, Inc.'s

("Supra") Motion for Oral Argument and BellSouth's Motion for Oral Argument.

In support thereof, BellSouth states the following:

1. On September 2, 1998, Supra filed its Motion for Oral Argument

and its Motion to Dismiss BellSouth's Motion for Reconsideration and Clarification or Order No. PSC-98-1001-FOF-TP and Motion to Strike BellSouth's Answer in Docket No. 980800-TP for Misconduct. On September 10, 1998, BellSouth filed its Response and Opposition to Supra's Motion to Dismiss and Motion to Strike for Misconduct and its Motion to Strike Supra's Motions as Sham Pleadings, Frivolous, Impertinent and Scandalous and For Sanctions.

2. BellSouth agrees that it is within the Commission's discretion to grant oral argument pursuant to Rule 25-22.058, Florida Administrative Code.

3. Due to the serious nature of the allegations made by Supra and the

request by BellSouth for sanctions, BellSouth agrees that oral argument is

appropriate. BellSouth, therefore, also seeks oral argument on its Motion.

WHEREFORE, BellSouth respectfully requests the Commission grant oral argument on Supra's Motions and BellSouth's Motion.

Respectfully submitted this 9th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

ROBERT G. BEATTY

NANCY B. WHITE c/o Nancy Sims 150 South Monroe Street, #400 Tallahassee, Florida 32301 (305) 347-5555

WILLIAM J. ELLENBERG II / //// 675 West Peachtree Street, #4300 Atlanta, Georgia 30375 (404) 335-0711