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RECORDS AND
REPORTING

February 1, 1999

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. 990043-TP

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Answer and Response to Arrow Communications, Inc., d/b/a ACI's Petition to Review and to Cancel Promotional Tariff, which we asked 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.

RECEIVED & FILED

Sincerely,

Nancy B. White
Nancy B. White (NW)

ACK _____ FPSC-BUREAU OF RECORDS

AFA _____

APP _____ NBW:jn

CAF _____ Enclosure

CMU *Pursett*

cc: All parties of record
Marshall M. Criser III
William J. Ellenberg II

CTR _____

EAG _____

LEG 1 _____

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RCH _____

SEC 1 _____

WAS _____

OTH _____

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CERTIFICATE OF SERVICE
Docket No. 990043-TP

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

U.S. Mail this 1st day of February, 1999 to the following:

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Attorney for ACI

Nancy B. White
Nancy B. White (P/W)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Review and to Cancel) Docket No.: 990043-TP
Promotion Tariff of BellSouth)
Telecommunications) Filed: February 1, 1999
_____)

**BELLSOUTH TELECOMMUNICATION, INC.'S
ANSWER AND RESPONSE TO ARROW COMMUNICATIONS, INC.,
d/b/a ACI'S PETITION TO REVIEW AND TO CANCEL
PROMOTIONAL TARIFF**

BellSouth Telecommunications, Inc., ("BellSouth"), hereby files its Answer and Response, pursuant to Rule 1.110, Florida Rules of Civil Procedure and Rules 25-22.037 and 25-22.0375, Florida Administrative Code, to the Petition to Review and To Cancel Promotional Tariff filed by Arrow Communications, Inc., d/b/a ACI. Notwithstanding ACI's allegations to the contrary, BellSouth has not violated the Telecommunications Act of 1996 (the "Act"), and Florida Statute or the Rules of the Florida Public Service Commission ("Commission"). BellSouth respectfully submits that the Petition should be denied.

For answers to the specific allegations in the Petition, BellSouth states as follows:

1. With regard to the allegations of Paragraph 1 of the Petition, BellSouth is without information sufficient to formulate a response thereto and, therefore, BellSouth denies the allegations of Paragraph 1 of the Petition.
2. With regard to the allegations of Paragraph 2 of the Petition, BellSouth admits that it filed a tariff on December 31, 1998 offering a promotion

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called "Three Free". The terms of the tariff offering speak for themselves.

BellSouth denies the remaining allegations of Paragraph 2.

3. With regard to the allegations of Paragraph 2 (a) of the Petition, BellSouth denies the allegations contained therein. BellSouth further avers that its tariff offering is available to all customers that meet the criteria set forth therein and is not unreasonably discriminatory.

4. With regard to the allegations of Paragraph 2(b) of the Petition, BellSouth denies the allegations contained therein. BellSouth further avers that its tariff offering is no different from promotions traditionally offered by local exchange companies. The requirements of section 364.08 (2), Florida Statutes are satisfied by the filing of a tariff.

5. With regard to the allegations of Paragraph 2(c) of the Petition, BellSouth denies the allegations contained therein.

6. With regard to the allegations of Paragraph 2(d) of the Petition, BellSouth denies the allegations contained therein. BellSouth further avers that its promotional tariff is not relevant to the determination of the wholesale discount.

7. With regard to the allegations of Paragraph 2(e) of the Petition, BellSouth denies the allegations contained therein.

And now, further answering, BellSouth states:

8. BellSouth's promotional tariff is no different than promotions offered by other local exchange companies in Florida.

9. BellSouth's promotional tariff is available for resale.

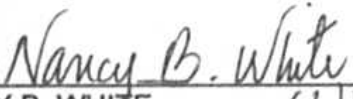
10. BellSouth provided all ALECs in Florida with 60 days notice of the tariff filing. ALECs could have countered with their own promotion (of which BellSouth would have no notice), but chose not to do so.

11. BellSouth should not be foreclosed from competing for customers. Indeed, Section 364.051(6)(a)(2), Florida Statutes provides that the local exchange telecommunications company may meet offerings by any competitive provider.

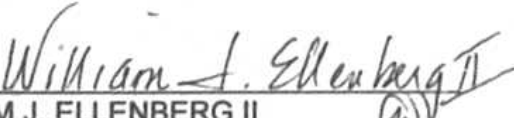
WHEREFORE, having fully answered the allegations raised in the Petition, BellSouth respectfully requests that ACI's Petition be dismissed as ACI is not entitled to the relief sought.

Respectfully submitted this 1st day of February, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



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