MICHAEL P. GOGGIN General Attorney BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561 ORIGINAL

November 19, 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. 990874-TP (US LEC Complaint)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to US LEC of Florida Inc.'s Second Motion for Leave to File Amended Complaint, which we ask that you file in the abovereferenced 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. Michael P. Goggin

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey

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DOCUMENT NUMBER-DATE

CERTIFICATE OF SERVICE Docket No. 990874-TP (US LEC Complaint)

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

U.S. Mail this 19th day of November, 1999 to the following:

Donna Clemons Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Aaron D. Cowell, Jr. General Counsel US LEC Corp. 401 N. Tryon Street Suite 1000 Charlotte, N.C. 28202 Tel. No. (704) 319-1117 Fax. No. (704) 319-3098

Patrick Knight Wiggins Wiggins & Villacorta 2145 Delta Boulevard Suite 200 Tallahassee, FL 32303 Tel. No. (850) 385-6007 Fax. No. (850) 385-6008

Richard M. Rindler Michael L. Shor Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., Suite 300 Washington, D.C. 20007 Tel. No. (202) 424-7775 Fax. No. (202) 424-7645

Michael P. Goggin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of US LEC of Florida, Inc. against) BellSouth Telecommunications, Inc. for) Breach of Terms of Florida Interconnection) Agreement under Sections 251 and 252 of the) Telecommunications Act of 1996, and Request) For Relief) Docket No. 990874-TP

ORIGINAL

Filed: November 19, 1999

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO US LEC OF FLORIDA, INC.'S SECOND MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

BellSouth Telecommunications, Inc., ("BellSouth"), hereby responds to US LEC

of Florida, Inc.'s ("US LEC") Second Motion for Leave to File Amended Complaint.

BellSouth does not object to the Motion, which, if granted, would permit US LEC to file

its Second Amended Complaint. BellSouth does object to many of the allegations

made in US LEC's Second Amended Complaint and intends to answer in due course

should US LEC's Motion be granted.

Respectfully submitted this 19th day of November, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE MICHAEL P. GOGGIN c/o Nancy H. Sims 150 So. Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5555

R. DOUGLAS LACKEY E. EARL EDENFIELD, JR. Suite 4300 675 W. Peachtree St., NE Atlanta, GA 30375 (404) 335-0747

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