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Legal Department

E. Earl Edenfield, Jr.
General Attorney

00 APR 24 PM 4:35

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0763

RECORDS AND REPORTING

April 24, 2000

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. 990750-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Leave to File Reply Memorandum and proposed Reply Memorandum in Support of its Motion for Reconsideration, 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,

E. Earl Edenfield Jr.
E. Earl Edenfield, Jr.

- AFA _____
- APP _____
- CAF _____
- CMU 1 _____
- CTR _____
- EAG _____
- LEG 1 _____
- MAS 2 _____
- OPC _____
- RRR _____
- SEC 1 _____
- WAW _____
- OTH _____

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

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[Signature]
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

In Re:) Docket No. 990750-TP
)
Petition for Arbitration of ITC^DeltaCom)
Communications, Inc. with BellSouth)
Telecommunications, Inc. pursuant to the)
Telecommunications Act of 1996.)
_____) Filed: April 24, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR LEAVE TO FILE REPLY MEMORANDUM**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves the Florida Public Service Commission for leave to file a Reply Memorandum in support of its motion seeking reconsideration of three aspects of Order No. PSC-00-0537-FOF-TP issued by Commission on March 15, 2000 ("March 15 Order"). A copy of BellSouth's proposed Reply Memorandum is attached.

As grounds for this Motion, BellSouth states that the three issues upon which BellSouth has sought reconsideration are of critical importance and could have an impact well beyond the interconnection agreement between ITC^Delta Communications, Inc. ("DeltaCom") and BellSouth. For example, if the Commission adopts a reciprocal compensation rate of \$.009 per minute of use for inclusion in the interconnection agreement between DeltaCom and BellSouth, it is likely that every Alternative Local Exchange Carrier ("ALEC") in Florida will seek to adopt that rate because it exceeds the forward-looking economic cost of transporting and terminating local traffic. Before resolving such critical issues that could impact the entire local market in Florida, the Commission should have the benefit all relevant information that bears on such issues, including the information set forth in BellSouth's proposed Reply Memorandum.

**CERTIFICATE OF SERVICE
Docket No. 990750-TP**

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

U.S. Mail this 24th day of April, 2000 to the following:

Diana Caldwell
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6175
Fax. No. (850) 413-6176

Parkey Jordan, Esq.
BellSouth Telecomm., Inc.
BellSouth Center
675 West Peachtree Street, N.E.
Suite 4300
Atlanta, Georgia 30375-0001
Tel. No. (404) 335-0794
Fax. No. (404) 658-9022

David I. Adelman, Esq.
Charles B. Jones, III, Esq.
Sutherland Asbill & Brennan L.L.P.
999 Peachtree Street
Atlanta, GA 30309-3996
Tel. No. (404) 853-8000
Fax. No. (404) 853-8806


E. Earl Edenfield, Jr. *for*

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^ DELTACOM
700 Blvd. South
Suite 101
Huntsville, Alabama 35802
Tel. No. (256) 650-3957
Fax. No. (256) 650-3936

J. Michael Huey
J. Andrew Bertron, Jr.
Huey, Guilday & Tucker, P.A.
106 East College Avenue
Suite 900 (32301)
Post Office Box 1794
Tallahassee, Florida 32302
Tel. No. (850) 224-7091
Fax. No. (850) 222-2593