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RECORDS AND
REPORTING

June 8, 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. 980119-TP (Supra Complaint)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Reconsideration which we ask that file in the above-referenced 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
(NW)

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey

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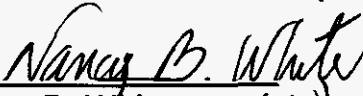
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**CERTIFICATE OF SERVICE
Docket No. 980119-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by *Hand Delivery and U.S. Mail this 8th day of June, 2000 to the following:

Beth Keating •
Legal Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel No. (850) 413-6212
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Mark E. Buechele, Esquire
Supra Telecommunications &
Information Systems, Inc.
2620 S. W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4212
Fax No. (305) 443-1078


Nancy B. White (M)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications) Docket No.: 980119-TP
and Information Systems, Inc., Against)
BellSouth Telecommunications, Inc.)
_____) Filed: June 8, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR RECONSIDERATION**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Florida Administrative Code, and case law cited herein, respectfully requests that the issue of whether BellSouth has complied with the edit checking capability required in Order No. PSC-98-1001-FOF-TP be resolved by the third party testing of BellSouth's Operations Support Systems ("OSS") presently being conducted pursuant to Order No. PSC-00-0104-PAA-TP. In support of its position, BellSouth states the following:

1. In Order No. PSC-98-1001-FOF-TP, issued on July 22, 1998, the Florida Public Service Commission ("Commission") ordered BellSouth, to among other things, modify the ALEC ordering systems to provide the same edit checking capability to Supra Telecommunications and Information Systems, Inc. ("Supra") that BellSouth's retail ordering systems provide. (Order 98-1001, pp.45-46).

2. In Order No. PSC-98-1467-FOF-TP, issued on October 28, 1998, the Commission clarified its previous order, holding that BellSouth was not required to provide the exact same interfaces to Supra with regard to edit checking capability as those used by BellSouth. (Order 98-1467, p. 18).

3. On November 25, 1998, BellSouth filed a complaint with the United States District Court for the Northern District of Florida appealing the Commission's

DOCUMENT NUMBER-DATE
07045 JUN-88
FPSC-RECORDS/REPORTING

decision concerning the edit checking capability. (Case No. 4:98CV404-RH). BellSouth sought injunctive relief from enforcement of the Commission's order on this issue.

4. On January 11, 1999, Supra filed a Notice that BellSouth had not complied with the Commission's final orders. BellSouth filed an opposition to this notice.

5. On April 26, 1999, BellSouth filed a Notice of Compliance with the Commission. On June 16, 1999, BellSouth filed a Motion to hold the federal appeal proceedings in abeyance pending a determination by the Commission on BellSouth's compliance vel non. The Court granted an abatement until February 1, 2000.

6. On February 11, 2000, the Commission issued Order No. PSC-00-0288-PCO-TP, holding that it could not make a determination of whether BellSouth was in compliance with the edit checking capability without a full evidentiary hearing and that such a hearing was inappropriate while the appeal was pending. The Commission affirmed this ruling on reconsideration in Order No. PSC-00-0798-FOF-TP, issued on April 24, 2000.

7. On April 12, 2000, BellSouth moved for a voluntary dismissal of its appeal specifically to enable the Commission to decide the issue at hand. On May 9, 2000, the federal district court granted BellSouth's motion.

8. BellSouth avers that changed circumstances require that the Commission reconsider the issue of whether BellSouth has modified the ALEC ordering systems, specifically the Telecommunications Access Gateway ("TAG"), LENS 99, and Robo-TAG, such that an ALEC may use these interfaces to submit orders using the same edits and capabilities that are applied to BellSouth's retail

orders and whether such modifications are in compliance with the edit checking capability required by the Commission.

9. The Commission has the authority to modify a previous order where there has been a change in circumstances or where there is a demonstrated public need or interest. A regulatory agency exercises continuing supervision over persons and activities regulated. Peoples Gas System v. Mason, 187 So.2d 335 (Fla. 1966) and Reedy Creek Utilities v. FPSC, 418 So.2d 249 (Fla. 1982). The determination of the capabilities of an ALEC ordering system is a process that must take into account a multiplicity of factors affecting the telecommunications industry and its customers. McCaw Communications of Florida, Inc. v. Clark, 679 So.2d 1177 (Fla. 1996).

10. The Commission has acknowledged that, absent the appeal pending before the federal court, a basis for reconsideration could be appropriate. Order No. PSC-00-0288-PCO-TP, p.10-11.

11. On January 11, 2000, the Commission issued Order No. PSC-00-0104-PAA-TP, approving the Master Test Plan of BellSouth's OSS. In Section VI of the Master Test Plan, the Third Party Tester will audit transaction verification and validation for the ordering function, including business rules. The test will encompass the issue in this docket, as well as the interfaces.


12. BellSouth avers that the issue that is the subject of this motion, i.e., whether BellSouth's ALEC ordering systems provide edit checking capability, will be resolved by the final test report and that an evidentiary hearing in this docket would be duplicative and time consuming. Therefore, BellSouth requests that the

Commission order that the issue as set forth herein be resolved by the outcome of the final third party test report.

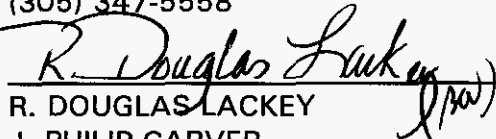
WHEREFORE, BellSouth moves that the Commission order that the issue of whether BellSouth has modified the ALEC ordering system, specifically TAG, LENS, and Robo-TAG so that an ALEC may use these interfaces to submit orders using the same edits and capabilities that are applied to BellSouth's retail orders and whether such modifications are in compliance with the edit checking capability required by the Commission be resolved by the final test report to be issued in Dockets 960786-TL and 981834-TP.

Respectfully submitted this 8th day of June, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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PC Docs 213483