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Legal Department

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Bennett L. Ross
General Attorney

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BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0793

RECORDS AND
REPORTING

August 4, 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. 990649-TP (UNE)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Motions to Bifucate and Suspend Proceedings, 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,

Bennett L. Ross
(initials)

Bennett L. Ross

cc: All Parties of Record

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Marshall M. Criser III

R. Douglas Lackey

Nancy B. White

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**CERTIFICATE OF SERVICE
Docket No. 990649-TP**

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

Federal Express and Electronically this 4th day of August, 2000 to the following:

Wayne D. Knight
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
Fax. No. (850) 413-6217
wknight@mail.psc.state.fl.us

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+) *
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. For FCCA
*Atty. for BlueStar
jjmclglothlin@mac-law.com

Marsha Rule (+)
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6343
mrule@att.com

Jim Lamoureux (+)
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, Georgia 30309
Tel. No. (404) 810-4196
Fax. No. (404) 877-7648
jlamoureux@att.com

Richard D. Melson (+)
Gabriel E. Nieto
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI
Atty. for Rhythms Link
rmelson@hgss.com

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488

Floyd Self
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Atty. for AT&T
fself@lawfla.com

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585

Jeremy Marcus (+)
Kristin Smith
Blumenfeld & Cohen
1625 Massachusetts Ave., Ste. 300
Washington, D.C. 20036
Tel. No. (202) 955-6300
Fax. No. (202) 955-6460
Represents Rhythms Links, Inc.
jeremy@technologylaw.com
kristin@technologylaw.com

Kimberly Caswell (+)
GTE Florida Incorporated
One Tampa City Center
201 North Franklin Street
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870
kimberly.caswell@verizon.com

Karen M. Camechis (+)
Pennington, Moore, Wilkinson &
Dunbar, P.A.
215 South Monroe Street, 2nd Flr.
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Represents Time Warner
Karen@penningtonlawfirm.com

Carolyn Marek (+)
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Carolyn.Marek@twtelecom.com

Mark E. Buechele, Esquire
Supra Telecom
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
mbuechele@stis.com

Donna Canzano McNulty, Esq. (+)
MCI WorldCom, Inc.
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mcnulty@wcom.com

Michael A. Gross (+)
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
125 South Gadsden Street
#200
Tallahassee, FL 32301-1525
Tel. No. (850) 222-5050
Fax. No. (850) 222-1355

Intermedia Communications, Inc.
Scott Sapperstein (+)
Sr. Policy Counsel
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923
SASapperstein@intermedia.com

Charles J. Rehwinkel (+)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Counsel for Sprint

John P. Fons (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Counsel for Sprint
jfons@ausley.com

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5500
Brian.Sulmonetti@wcom.com

Catherine F. Boone, Esq. (+)
Regional Counsel
Covad Communications Company
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
Fax. No. (678) 320-9433
cboone@covad.com

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Eric J. Branfman (+)
Morton J. Posner (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7500
Fax. No. (202) 424-7645
Represents Florida Digital Network, Inc.
mjposner@swidlaw.com

John McLaughlin
KMC Telecom. Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096
Tel. No. (770) 931-5260
Fax. No. (770) 638-6796
jmclau@kmctelecom.com

Bettye Willis (+)
ALLTEL Communications
Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177
bettye.j.willis@alltel.com

J. Jeffry Wahlen (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
Atty. for ALLTEL
jwahlen@ausley.com

Stephen P. Bowen
Blumenfeld & Cohen
4 Embarcadero Center
Suite 1170
San Francisco, CA 94111
Tel. No. (415) 394-7500
Fax. No. (415) 394-7505
stephen@technologylaw.com

Norton Cutler (+)
General Counsel
BlueStar Networks, Inc.
401 Church Street
24th Floor
Nashville, Tennessee 37201
Tel. No. (615) 346-3848
Fax. No. (615) 255-2102
norton.cutler@bluestar.com

Michael Bressman (+)
Associate General Counsel
5 Corporate Centre
801 Crescent Centre Drive
Suite 600
Franklin, Tennessee 37067
Tel. No. (615) 778-7350
Fax. No. (615) 788-7354
michael.bressman@bluestar.com

Charles J. Pellegrini
Wiggins & Villacorta, P.A.
2145 Delta Boulevard, Suite 200
Tallahassee, FL 32303
Represents Intermedia
wiggvill@nettally.com

George S. Ford (+)
Chief Economist
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jacanis@kelleydrye.com
mhazzard@kelleydrye.com
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Russell M. Blau
Marc B. Rothschild (+)
Robert Ridings
Swidler Berlin Shereff Friedman
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7755
Fax. No. (202) 424-7643
Attys. for Broadslate Networks, Inc.
Attys. for Network Telephone
Attys. for Cleartel Comm.
mbrothschild@swidlaw.com
rmlblau@swidlaw.com
rridings@swidlaw.com

John Spilman
Director Regulatory Affairs and
Industry Relations
Broadslate Networks, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911
Tel. No. (804) 220-7606
Fax. No. (804) 220-7701

Gary Cohen (+)
Blumfeld & Cohen
1625 Massachusetts Ave., N.W.
Suite 320
Washington, D.C. 20036
Represents Rhythms Links, Inc.
gary@technologylaw.com

Hope G. Colantonio
Legal & Regulatory Manager
Cleartel Communications, Inc.
1255 22nd Street N.W., 6th Floor
Washington, D.C. 20037
Tel. No. (202) 715-1300

Brent E. McMahan
Vice President Regulatory and
Government Affairs
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501


Bennett L. Ross 

(+) Signed Protective Agreement

219337

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
Pricing of Unbundled Network) Docket No. 990649-TP
Elements)
_____) Filed: August 4, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE TO MOTIONS TO BIFURCATE
AND SUSPEND PROCEEDINGS

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits this response to the motions filed by Verizon Florida, Inc. ("Verizon") and Sprint-Florida, Inc. and Sprint Communications Company Limited Partnership (collectively referred to as "Sprint"), which generally seek to bifurcate and continue the proceedings as they relate to these companies. While BellSouth does not necessarily object to either motion, BellSouth has two concerns, which it asks that the Commission consider in ruling on Verizon's and Sprint's motions.

First, BellSouth is prepared to proceed with the current schedule to establish rates for the unbundled network elements and interconnection services that BellSouth makes available to alternative local exchange carriers ("ALECs") in Florida. Notwithstanding any uncertainty created by the recent decision of the United States Court of Appeals for the Eighth Circuit, BellSouth believes that the Commission can and should proceed with establishing rates for BellSouth -- a view that is apparently shared by every other party to this proceeding. In fact, no party has requested that the hearings scheduled for next month be continued as they relate to BellSouth.

By bifurcating the proceedings as requested by Verizon and Sprint, the Commission can proceed with the current schedule as it relates to BellSouth, while

accommodating Verizon's and Sprint's desire for a continuance. However, to the extent the Commission is not inclined to bifurcate the proceedings and instead wants to have a single proceeding to establish rates for BellSouth, Verizon, and Sprint at the same time, then BellSouth has no choice but to oppose any request for a continuance.

Second, BellSouth is concerned about Sprint's apparent desire to bifurcate the proceedings, but at the same time participate in the BellSouth proceeding in order to challenge BellSouth's cost studies. This is particularly true since Sprint's challenge is based, at least in part, upon Sprint's own cost studies – the same cost studies which it now claims it is “unable to adequately defend....” Sprint's Motion ¶ 5. If Sprint cannot defend its cost studies so as to proceed with hearings to establish rates for Sprint, it should not be permitted to rely upon those same cost studies in its rebuttal testimony filed against BellSouth. Although Sprint indicates that it intends to withdraw certain testimony “after consultation with Staff and the parties...,” the Commission should make clear that any testimony referring to Sprint's cost studies will be stricken in the event that Sprint's motion for a continuance is granted.

Respectfully submitted this 4th day of August, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White
(AM)

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

Bennett L. Ross
(AM)

BENNETT L. ROSS
E. EARL EDENFIELD, JR.
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0793

223481