

ORIGINAL

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October 10, 2001

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
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Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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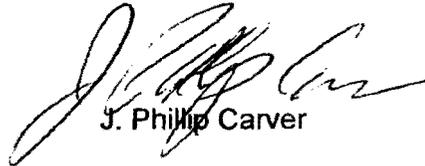
Re: Docket No. 000121-TP (OSS)

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Response In Opposition to AT&T's Motion for Extension, which we ask 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.

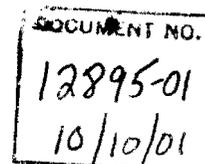
Sincerely,



J. Phillip Carver

Enclosures

cc: All parties of record  
Marshall M. Criser, III  
Nancy B. White  
R. Douglas Lackey



**CERTIFICATE OF SERVICE**  
**Docket No. 000121 -TP**

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

U.S. Mail and \*Hand Delivery this 10th day of October, 2001 to the following:

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**J. Phillip Carver**

**(+) Signed Protective  
Agreement**

#237366

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the ) Docket No. 000 12 1 -TP  
Establishment of Operations Support )  
Systems Permanent Performance )  
Measures for Incumbent Local Exchange )  
Telecommunications Companies ) Filed: October 10, 2001

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE IN  
OPPOSITION TO AT&T'S MOTION FOR EXTENSION**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files, pursuant to Rule 25-22037, Florida Administrative Code, its Response in Opposition to AT&T's Motion for Extension of Time To File Comments and To Postpone Workshop, and states the following:

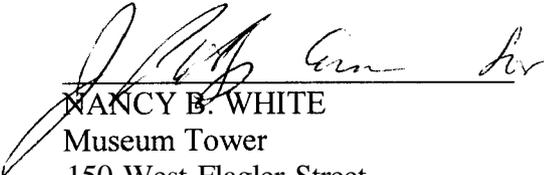
1. AT&T's request should be denied. The Final Order in this proceeding (Order No. PSC-01 - 18 19-FOF-TP) contemplates three steps that relate to the issue at hand: (1) that 45 days after issuance of the Order, BellSouth will file a Performance Assessment Plan that complies with the requirements of the Order; (2) Fifteen days prior to this date (i.e., 30 days after the date of the Order), there will be a status conference to discuss BellSouth's proposed plan; (3) a draft of the plan will be provided to Staff at a time to be agreed upon prior to the Status Conference. There are no further pertinent requirements of the Order. AT&T has now requested that the above-described process grind to a halt so that it can comb through BellSouth's draft proposal and file an extensive document listing every objection it can think to raise. AT&T has requested to have until October 29 to file its comments. This constitutes 25 days to review the SQM filed October 4, 2001, and 18 days to review the SEEM plan that BellSouth has agreed to file tomorrow. There is no justification for this request.

2. The Order contemplates moving forward with the above-described process expeditiously, a goal that is completely incompatible with the delay requested by AT&T. The Order does not contemplate that AT&T and the other CLECs will have an opportunity (let alone an opportunity to take almost a month) to flyspeck BellSouth's preliminary proposal and raise every possible objection at this juncture. Moreover, it is simply not appropriate to do so at this point. BellSouth's SQM that has been filed, and the SEEM plan that will be filed tomorrow, are works in progress. The obvious point of the Status Conference is for Staff to give appropriate input so that BellSouth can finalize the filings that it is required to make under the accelerated schedule of the Order. If AT&T and the other CLECs wish to attend the Status Conference and provide their input as well, then they are certainly free to do so. There is no justification, however, to inject into this accelerated schedule an extended delay while the CLECs search for objections to a preliminary draft of BellSouth's plan.

3. Further, what AT&T fails to mention is the obvious fact that the requested delay will make it impossible for BellSouth to meet the 45 day requirement of the Order. The Order was issued on September 10, 2001, making BellSouth's Proposed Plan due October 25, 2001. AT&T proposes that its comments would not be due until four days later, and the Status Conference would take place 56 days after the Order was entered, i.e., eleven days after the deadline for BellSouth to file its proposed plan. Thus, if AT&T's request is granted, the date for BellSouth to comply with the Order would have to be extended as well. To allow BellSouth adequate time after the Status Conference to finalize its plan, the extended due date to file the plan could be due no sooner than November 20, 2001.

4. BellSouth believes that the better approach is to simply move forward with the workshop as scheduled. Again, the Order does not contemplate an extensive comment cycle based upon the preliminary drafts filed prior to the workshop. AT&T's attempt to interject this additional, time-consuming step into the process will result in delay, but will accomplish little else. For this reason, BellSouth requests that AT&T's Motion be denied. If, however, AT&T's Motion is granted, the date for BellSouth to file its performance assessment plan must also be extended to at no earlier than November 20, 2001.

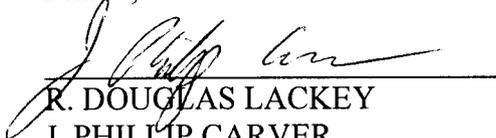
Respectfully submitted this 10th day of October, 2001.



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