

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

Petition of AT&T Communications
of the Southern States, Inc., TCG
South Florida, and MediaOne Florida
Telecommunications, Inc. for Structural
Separation of BellSouth Telecommunications, Inc.

Docket No.: 010345-TP

NOTICE OF FILING CORRECTED FIRST PAGE

PLEASE TAKE NOTICE that Petitioners AT&T Communications of the Southern States, Inc., TCG South Florida, and Media One Florida Telecommunications, Inc., file its corrected first page of Petitioners' Motion for Reconsideration originally filed on November 21, 2001 in order to correct an erroneous date of May 2, 2001 as shown in the case style.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail service this 21st day of November, 2001 to the following:

Ms. Nancy B. White Mr. James Meza, III 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301 BellSouth Telecommunications, Inc.	Mr. R. Douglas Lackey Mr. E. Earl Edenfield, Jr. Mr. Patrick W. Turner 675 West Peachtree Street, N.E., Suite 4300 Atlanta, Georgia 30375 BellSouth Telecommunications, Inc.
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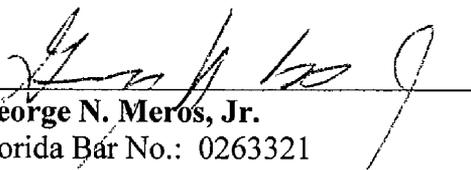
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<p>Mr. Michael A. Gross, Vice President, Regulatory Affairs & Regulatory Counsel 246 East 6th Avenue, Suite 100 Tallahassee, Florida 32301 Florida Cable Telecommunication Association (FCTA)</p>	<p>Mr. Joseph W. Hatchett Mr. Fred R. Dudley Mr. James Bruce Culpepper Akerman, Senterfitt & Eidson, P.A. 301 South Bronough, Suite 200 Tallahassee, Florida 32301-1707 AT&T Communications of the Southern States, Inc.</p>
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PETITIONERS' MOTION FOR RECONSIDERATION

Petitioners AT&T Communications of the Southern States, Inc., TCG South Florida, and Media One Florida Telecommunications, Inc., pursuant to Rule 25-22.060, Florida Administrative Code, file this motion for reconsideration of the Commission's order dated November 6, 2001 ("Order.")

The Commission should grant reconsideration because its Order overlooks or misapprehends essential points of law, any one of which demonstrates manifest error. Specifically, the Commission overlooked or misapprehended at least the following:

1. The Commission's Order decides this case on the merits, but without benefit of due process or compliance with established rules. There was no discovery, sworn testimony or exhibits, or opportunity for cross-examination. The Order acknowledged the impropriety of deciding a motion to dismiss on the merits, in the absence of evidentiary proceedings, but did so anyway.
2. At the Agenda Conference on May 29, 2001, the Commission also acknowledged that its workshop on issues relating to structural separation would not supplant evidentiary proceedings, and that the Commission's decision on jurisdiction would be restricted to "looking at the four corners of the document [petition]." Yet in the Order under review, the Commission