Legal Department

BENNETT L. ROSS General Attorney

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

July 13, 1998

RECOUS AND

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. 971140-TP (Recombination Docket)

Dear Ms. Bayó:

RCH ____

SEC ___

WAS _____

OTH ____

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Motion for Extension of Time to File Interconnection Agreement, 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.

ACK AFA APP	<u></u>	RECEIVED & FILED FPSC-BUREAU OF RECORDS	Sincerely, Bennett L. Ross	- (KR)
CAF	A	Enclosures		
CMU	Stav	terza		
CTR		cc: All parties of record		
EAG		A. M. Lombardo		
LEG		R. G. Beatty William J. Ellenberg II		
LIN	5	William G. Chemberg II		
OPC				

DOCUMENT NUMBER DATE

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CERTIFICATE OF SERVICE DOCKET NO. 971140-TP (Recombination Issues)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 13th day of July, 1998 to the following:

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Bennett L. Ross

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Motions of AT&T Communications)	Docket No. 971140-TP
of the Southern States, Inc. and MCI)	
Telecommunications Corporation and)	
MCI Metro Access Transmission Services,)	
Inc. to Compel BellSouth)	
Telecommunications, Inc. to comply with)	
Order PSC-96-1579-FOF-TP and to set)	
non-recurring charges for combinations of)	
network elements with BellSouth)	
Telecommunications, Inc. pursuant to their)	
agreement)	
)	Filed: July 13, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR EXTENSION OF TIME TO FILE INTERCONNECTION AGREEMENT

BellSouth Telecommunications, Inc., ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby files a Motion for Extension of Time. In support of this request, BellSouth states as follows:

- 1. By Order No. PSC-98-0810-FOF-TP issued June 12, 1998 ("June 12 Order"), BellSouth and MCImetro Access Transmission Services, Inc. ("MCIm") were directed to negotiate "what competitive local telecommunications services provisioned by means of unbundled access, if any, constitute the recreation of the incumbent local exchange carrier's retail service." The parties also were directed to file a written agreement "memoralizing and implementing" the Commission's decisions in its June 12 Order "within thirty days of the issuance of this order."
- 2. On June 29, 1998, BellSouth filed a Motion for Reconsideration of the June 12 Order. In part, the motion asked the Commission to reconsider its discussion associated with the migration of an existing BellSouth customer, which BellSouth

believes is inconsistent with the Commission's holding that the price had not been determined for combinations of elements that recreate an existing BellSouth retail service. Migration is inextricably intertwined with the issue BellSouth and MCIm have been directed to negotiate. The Commission's discussion of migration has created confusion as to the Commission's ultimate decisions and has engendered divergent views as to the decisions reached as well as the supporting rationale. The differing views have made negotiations difficult for BellSouth.

- 3. The parties discussed the issue of the network elements that recreate an existing BellSouth retail service, among other matters, on July 9, 1998. During this meeting, BellSouth suggested that the parties file a joint request for an extension of time so that the parties could continue these discussions after the Commission had resolved the Motion for Reconsideration. MCIm declined to do so. BellSouth reiterated its request in a letter to MCIm on July 10, 1998. As of the filing of this motion, MCIm has not responded to this letter.
- 4. The issue of the network elements that recreate an existing BellSouth retail service is a critical one. BellSouth believes that the Order on the Motion for Reconsideration reflecting the Commission's decisions will significantly aid in negotiating this issue and in achieving the appropriate language to be included in the written agreement.
- 5. For the reasons discussed above, BellSouth requests that the Commission grant an extension of time to file the written agreement until 14 days after the order resolving the Motion for Reconsideration is issued.

WHEREFORE, BellSouth respectfully urges the Commission to extend the filing deadline for filing the written agreement until 14 days after the order resolving the request for reconsideration is issued.

Respectfully submitted this 13th day of July 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

(KR)

(KC)

ROBERT G. BEATTY

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