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July 20, 2000

## VIA FEDERAL EXPRESS

Mr. E. Earl Edenfield, Jr. BellSouth Telecommunications, Inc. Legal Department **Suite 4300** 675 West Peachtree Street Atlanta, Georgia 30375-0001

Re: Docket No. 991534

Dear Mr. Edenfield:

I have your July 7<sup>th</sup> response to my letter of June 29<sup>th</sup> to Ms. White. As I stated in my letter to Ms. White, we delivered Exhibit 20 to BellSouth, as has been our long-time practice, on the same day we filed it with the Commission, June 19. The outrage I expressed in my letter resulted from your inexplicable failure to do anyone of a number of reasonable things if the exhibit for some reason did not reach your hands that day or soon after, rather than what you did.

I am not writing to engage in further debate with you on the matter of Intermedia's interconnection arrangements in the Atlanta LATA. The record is closed and the Commission will decide. In fact, in Commissioner Deason's instruction to Intermedia, which was "completely satisfactory to BellSouth," to file an exhibit showing these arrangements, he did not go so far as to permit BellSouth a response. Nevertheless, as a non-record communication, Intermedia does not intend to oppose your July 7th letter, even though it exceeds Commissioner Deason's instruction. However, despite all of our attempts to explain these arrangements, you show in your response an inability to understand them for what they are.

For the sake of clarity, let me just say this. Intermedia is direct trunked to every tandem in the Atlanta LATA. Where Intermedia provides local service it is direct trunked to BellSouth's local access tandems, i.e., Gainesville, Buckhead, East Point, Norcross, Athens and Buckhead "Local Only." Where Intermedia provides intraLATA long distance service in the Atlanta ·LATA, it is trunked to BellSouth's access tandems by means of FGD trunks, i.e., Athens, Buckhead, East Point, Columbus, Norcross and Gainesville.

At hearing, Mr. Milner, while acknowledging that Intermedia does not have an MTA arrangement in Florida, alleged that Intermedia has an MTA arrangement in Georgia. To support that allegation, he simply relied on an "investigation" that apparently showed that Intermedia is not trunked to either the Columbus local access or access tandem. This is untrue. Intermedia provides only toll service to Columbus and, since April 1997, has been trunked to BellSouth's

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access tandem there for that purpose. Intermedia does not rely on BellSouth's circuits for traffic to and from the Columbus tandem.

All of this is quite clear in Exhibit 20 and in Intermedia's Post-Hearing Brief. Moreover, if Mr. Thomas' testimony is fairly (not selectively) read, side-by-side Mr. Milner's testimony, nothing in Mr. Thomas' testimony is inconsistent with the description above of Intermedia's Atlanta network.

Sincerely,

Charles J. Pellegrini

c: Ms. Blanca Bayò, Florida Public Service Commission Ms. Marlene Stern, Florida Public Service Commission