JAMES MEZA III Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

February 13, 2001

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. 010098-TP (Florida Digital)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for a More Definite Statement, 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,

James Meza III (A)

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

CERTIFICATE OF SERVICE DOCKET NO. 010098-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 13th day of February, 2001 to the following:

Felicia Banks
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Matthew Feil Florida Digital Network 390 North Orange Avenue Suite 2000 Orlando, FL 32801 Tel. No. (407) 835-0460

Michael C. Solan Michael P. Donahue Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., Suite 300 Washington, D.C. 20007-5116 Tel. No. (202) 424-7500

James Meza III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Digital Network,)	Docket No. 010098-TP
Inc., for Arbitration of Certain Terms and)	
Resale Agreement with BellSouth)	
Telecommunications, Inc. Under the)	
Telecommunications Act of 1996)	
	j ,	Filed: February 13, 2001

MOTION OF BELLSOUTH TELECOMMUNICATIONS, INC. FOR A MORE DEFINITE STATEMENT

BellSouth Telecommunications, Inc., ("BellSouth"), hereby files this Motion for a More Definite Statement, pursuant to Rule 1.140(e), Florida Rules of Civil Procedure and Rule 28-106.24, Florida Administrative Code, in response to Florida Digital Network, Inc.'s ("FDN") Petition for Arbitration. BellSouth respectfully submits that Issue 9 of the Petition is not sufficiently specific to put BellSouth on notice as to the nature of FDN's claims and position. Issue 9 is too general to provide adequate notice to BellSouth of any specific allegations to which a response would be required. Specifically, BellSouth is unable to identify the contested issues or FDN's position regarding the topics identified in Issue 9.

In accordance with the Commission's rules and the Florida Rules of Civil
....
Procedure, BellSouth reserves the right to file a formal response to this Petition
within ten days after the filing by FDN of an amended complaint or the denial of
this motion. If BellSouth does file a response prior to that time, BellSouth
reserves the right to amend its response to address any amended Petition.

For the reasons stated above, BellSouth respectfully requests that the Commission grant its Motion for a More Definite Statement.

Respectfully submitted this 13th day of February, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE JAMES MEZA III c/o Nancy Sims

150 South Monroe Street, #400 Tallahassee, Florida 32301

(305)347-5558

R. DOUGLAS LACKEY

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0747

247207