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June 26, 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. 990649-TP (UNEs)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Opposition to Joint Motion for MCI WorldCom, Inc. and AT&T Communications of the Southern States, Inc. to Accept Proposed Expedited Hearing Schedule which we ask that you file in the above referenced 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,

Nancy B. White

Nancy B. White (KA)

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

DOCUMENT NUMBER: DATE

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 990649-TP

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

U.S. Mail this 26th day of June, 2001 to the following:

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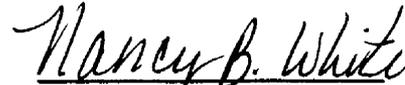
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120 days from the date of the Order. The cost models to be revised are BellSouth's xDSL nonrecurring cost study, the BST Loop Model, and the BellSouth Cost Calculator. The Order also requires the parties to the docket to file proposals addressing the network security and inventory issues for accessing each sub-loop element.

3. The Order requires BellSouth to revise and refile the BST Loop Model to explicitly model all cable and associated supporting structural engineering and installation placements, as well as revise the BellSouth Cost Calculator. Order at p. 242. The Commission stated that "thereafter, we shall address whether it would be appropriate to revisit the loop rates set in this proceeding on a prospective basis." *Id.* This requirement and language is repeated elsewhere in the Order, as well. See, pp. 193 and 263.

4. The Order does not require that a hearing be held after this filing is made. Absolutely no mention of a hearing is made in connection with the refiling of the BST Loop Model and the BellSouth Cost Calculator. To hold hearings on the refiling of these two cost models would be to retry the case itself, allowing AT&T and MCI two bites at the apple. The Order specifically states that the Commission will determine whether it needs to revisit the rates, not that MCI and AT&T will have that role. Another hearing would be unnecessary and duplicative.

5. With regard to the proposals addressing the network security and inventory issues for accessing each sub-loop element, again, there is nothing in the Order requiring a hearing on this issue. Order, pp. 96-97.

6. The requirement that BellSouth file a cost study for hybrid copper fiber xDSL-capable loops and a revised xDSL nonrecurring cost study is the sole instance in which the Commission specifically stated that "we will schedule a hearing to address whether the final DSL rates we set in this proceeding should be revisited." Order, p. 67. Thus, where the Commission ordered a hearing, it was specifically stated. Where it was not so stated, the Commission obviously did not believe a hearing was appropriate. BellSouth believes the only issue that is appropriate for hearing is the issue on whether the DSL rates adopted in the Order should be revised. BellSouth, therefore, opposes the Joint Motion.

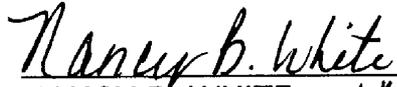
7. In addition, BellSouth opposes the proposed schedule in the Joint Motion. Joint Motion, p.2. Although AT&T and MCI call this schedule "expedited", nothing could be further from the case. The schedule allows two months for the ALECs to file rebuttal testimony, the hearing is not until January, 2002, and the Order not until March 2002. Such a schedule is not expedited, but bloated instead. A hearing on the limited and narrow issue of whether the DSL rates should be revisited should not take seven months. BellSouth would propose a schedule on this limited issue that provides, at most, for three to four weeks between the filing of direct and rebuttal

testimony, hearings before the end of the year and an order by early January. Therefore, BellSouth opposes the scheduled proposed by AT&T and MCI and requests that the hearing schedule be compressed and truly expedited.

WHEREFORE, BellSouth requests that the Commission deny the Joint Motion, rule that the sole issue on which a hearing is to be held is the issue of revisiting vel non the DSL rates, and schedule a hearing on same to be ruled upon by early January.

Respectfully submitted this June 26, 2001.

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