

NANCY B. WHITE
General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

February 19, 1999

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECORDS AND
REPORTING

FEB 19 AM 11:21

FEB 19 1999

Re: Docket No. 980918-TC

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications Inc.'s Prehearing Statement, 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.

Sincerely,

Nancy B. White (KR)
Nancy B. White

NBW:jn
Enclosures

cc: Parties of Record
Marshall M. Criser III
William J. Ellenberg II

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Sec-1
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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 980918-TC**

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

U.S. Mail this 19th day of February, 1999 to the following:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Florida BillSouth Telephone Company
12791 S.W. 8th Terrace
Miami, FL 33184-2242
Tel. No. (305) 207-1687
Fax. No (305) 207-1687

Nancy B. White (ke)
Nancy B. White

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate to)
provide pay telephone service by)
Florida BellSouth Telephone Company)
_____)

Docket No.: 980918-TC

Filed: February 19, 1999

PREHEARING STATEMENT OF BELL SOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth"), in compliance with Case Administrative Schedule Record, hereby submits its Prehearing Statement for Docket No. 980918-TL

A. Witnesses

BellSouth proposes to call the following witness to offer testimony on the issues in this docket:

<u>Witness</u>	<u>Issue(s)</u>
Sandra J. Evans (Direct)	All

BellSouth reserves the right to call additional witnesses, witnesses to respond to Commission inquiries not addressed in direct or rebuttal testimony and witnesses to address issues not presently designated that may be designated by the Prehearing Officer at the prehearing conference to be held on March 5, 1999. BellSouth has listed the witnesses for whom BellSouth believes testimony will be filed, but reserves the right to supplement that list if necessary.

DOCUMENT NUMBER-DATE

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B. Exhibits

Sandra J. Evans

SE-1 November 12, 1998
clipping from the Palm Beach
Post

SE-2 December 9, 1998 Interview
with WAMI-TV

BellSouth reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. BellSouth also reserves the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

BellSouth believes that the name "BillSouth" is against the public interest. The name is confusingly similar to BellSouth's trademarked name and likely to mislead the public. This Commission should not grant a certificate to the company using the name "BillSouth".

D. BellSouth's Position on the Issues

Issue 1: Should the Florida Public Service Commission grant a certificate for pay telephone service to Florida BillSouth Telephone Company?

Position: No.

E. Stipulations

None.

F. Pending Motions

None.

G. Other Requirements

None.

Respectfully submitted this 19th day of February, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B White (cc)

NANCY B. WHITE
c/o Nancy H. Sims
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(305) 347-5555

William J Ellenberg II (cc)

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