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Legal Department

MICHAEL P. GOGGIN
General Attorney

99 APR -8 PM 4: 21

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

RECORDS AND
REPORTING

April 8, 1999

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

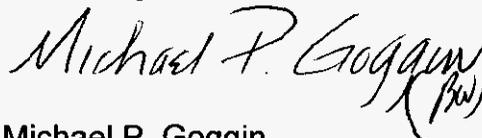
Re: Docket No. 990332-TP (Worldlink)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for a More Definite Statement, which we ask that you file in the above-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.

Sincerely,



Michael P. Goggin

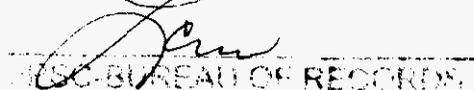
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- SEC 1 _____
- WAS _____
- OTH _____

/v/

Enclosures

cc: All parties of record
Marshall M. Criser III
William J. Ellenberg II

RECEIVED & FILED



DOCUMENT NUMBER-DATE

04574 APR-89

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 990332-TP

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

U.S. Mail this 8th day of April, 1999 to the following:

Staff Counsel - Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32350-0850

Worldlink Long Distance Corp.
600 Brickell Avenue, Suite 300M
Miami, FL 33131-2539
Tel: 305-373-3373
Fax: 305-373-3370


Michael P. Goggin (for)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Worldlink Long Distance Corp.) Docket No. 990332-TP
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)
)
)
_____) Filed: April 8, 1999

**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 Rules 25-22.037 and 25-22.0375, Florida Administrative Code, in response to Worldlink Long Distance Corp.'s ("Worldlink's") Complaint.

BellSouth respectfully submits that the Complaint is not sufficiently specific to put BellSouth on notice as to the nature of Worldlink's claims. The Complaint includes statements of general dissatisfaction with BellSouth's service, but does not specifically identify any duty owed by BellSouth, under statute, rule or contract, that has been breached. Moreover, the comments in the complaint regarding BellSouth's service are too general to provide adequate notice to BellSouth of any specific allegations to which a response would be required.

In accordance with the Commission's rules and the Florida Rules of Civil Procedure, BellSouth reserves the right to file a formal answer to this complaint within ten days after the filing by Worldlink of an amended complaint or the denial of this motion.

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

DOCUMENT NUMBER-DATE
04574 APR-88
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Respectfully submitted this 8th day of April, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (for)
MICHAEL P. GOGGIN

c/o Nancy Sims
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William J. Ellenberg II

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