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Guy M. Hicks
General Counsel

June 4, 1999

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JUN 04 1999

TN REGULATORY AUTHORITY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Tariff to Offer Contract Service Arrangement TN98-2766-00*
Docket No. 99-00210 ✓

BellSouth Tariff to Offer Contract Service Arrangement TN98-6726-00
Docket No. 99-00230 ✓

BellSouth Tariff to Offer Contract Service Arrangement KY98-4958-00
Docket No. 99-00244 ✓

BellSouth Tariff to Offer Contract Service Arrangement TN98-6303-01
Docket No. 99-00262 ✓

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Response to Motion of SECCA and NEXTLINK for Continuance. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

165776

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Docket Files

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *BellSouth Tariff to Offer Contract Service Arrangement TN98-2766-00*
Docket No. 99-00210

BellSouth Tariff to Offer Contract Service Arrangement TN98-6726-00
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Docket No. 99-00262

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO
MOTION OF SECCA AND NEXTLINK FOR CONTINUANCE

On the afternoon of Friday, June 4, 1999, the Southeastern Competitive Carriers Association ("SECCA") and NEXTLINK of Tennessee, Inc. ("NEXTLINK") filed a "Motion For a Continuance and Response to BellSouth's Opposition to Amended and Supplemental Petitions to Intervene" ("Motion"), requesting that the Authority defer consideration of these four CSAs until June 22, 1999. BellSouth opposes this Motion.

First, counsel for both SECCA and NEXTLINK had due notice that the CSAs would be taken up at the June 8, 1999 Directors' Conference because all four CSAs were listed on the Authority's preliminary agenda issued on May 27, 1999. Yet, counsel did not file its Motion until a week later. No explanation is given for this delay.

Second, at least one of these CSAs -- CSA TN98-2766-00 -- has been pending since March 1999. While the other three CSAs were filed in April 1999, all four CSA customers have waited patiently to enjoy the benefit of the lower prices their CSAs will bring. These lower prices should not be delayed further.

Third, NEXTLINK and SECCA erroneously argue that a continuance is warranted because the Authority "postponed consideration of the intervention issue at the May 18 conference ..., " suggesting that it did so at BellSouth's request. Nothing could be farther from the truth. Only one of these four CSAs -- TN98-6303-01 -- was even on the May 18 agenda, and it was a docket in which neither NEXTLINK nor SECCA had bothered to file a petition to intervene until May 13. Although NEXTLINK and SECCA had filed a "Supplement to Petitions To Intervene" on May 10 which identified TN98-6303-01 in the caption, there was nothing to "supplement" at that time. Before anyone was given the opportunity to be heard, Director Greer moved that this one CSA be deferred to give BellSouth the opportunity to respond to NEXTLINK and SECCA's filing. Deferring consideration of one CSA as a result of the confusion NEXTLINK and SECCA had created hardly justifies granting a continuance here.

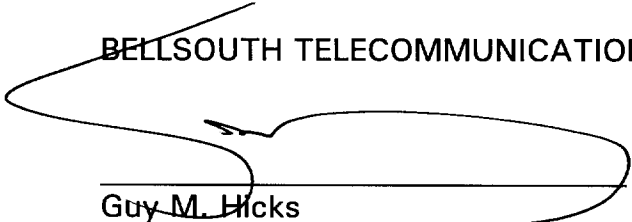
Finally, denying the request for a continuance will not prejudice either NEXTLINK or SECCA. Indeed, in their Motion, NEXTLINK and SECCA claim that the Authority can allow BellSouth's "pending and future CSAs to become effective" so long as they "meet the Authority's previously established criteria regarding price, duration, and termination provisions." Motion at 4-5 (emphasis

added). Here, these four CSAs meet those criteria. Thus, denying the motion for continuance, denying the petitions to intervene in these dockets, and approving the CSAs at issue is entirely consistent with NEXTLINK's and SECCA's very own suggestion.

For the foregoing reasons, the Authority should deny NEXTLINK's and SECCA's motion.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE

I hereby certify that on June 4, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand
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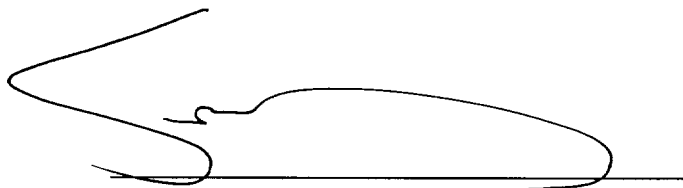
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A handwritten signature in black ink, appearing to be "R. Collier", written over a horizontal line.