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June 6, 2002

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED FPSC
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COMMISSION
CLERK

Re: Docket No. 020129-TP

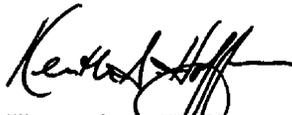
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of US LEC of Florida Inc., Time Warner Telecom of Florida, LP and ITC^DeltaCom Communications ("Petitioners") are the original and fifteen copies of their Proposed Issues.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,


Kenneth A. Hoffman

KAH/rl
USLEC\Bayo.606

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
05935 JUN-68

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of US LEC of Florida)
Inc., Time Warner Telecom of Florida, LP)
and ITC^DeltaCom Communications)
objecting to and requesting)
suspension of proposed CCS7)
Access Arrangement Tariff filed by)
BellSouth Telecommunications, Inc.)
)
)
_____)

Docket No. 020129-TP

Filed: June 6, 2002

**US LEC OF FLORIDA INC.,
TIME WARNER TELECOM OF FLORIDA, LP
AND ITC^DELTACOM COMMUNICATIONS
PROPOSED ISSUES**

Comes now US LEC of Florida Inc., Time Warner Telecom of Florida, LP and ITC^Deltacom Communications (“Petitioners”), and pursuant to the memorandum issued by the Staff of the Florida Public Service Commission on May 24, 2002, in reference to the above-captioned docket, hereby submit the following proposed issues for hearing and decision by the Commission in this proceeding:

- Issue 1: Does BellSouth’s CCS7 access arrangement tariff (“CCS7 Tariff”) apply only to intrastate IntraLATA and InterLATA calls?
- Issue 2: Did BellSouth provide CCS7 access service to ALECs, IXCs, and other carriers prior to filing its CCS7 Tariff?
- Issue 3: Is BellSouth’s CCS7 Tariff revenue neutral for all classes of carriers based upon BellSouth’s claimed corresponding reduction to local switching rates?
- (a) If not revenue neutral for all classes of carriers (i.e., both IXCs and ALECs), does BellSouth propose that one class of carriers subsidize the other class?
 - (b) If not revenue neutral for all classes of carriers, does BellSouth bill the same TCAP and ISUP charge to more than one carrier?

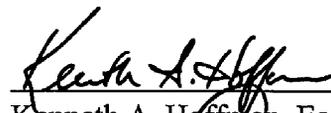
DOCUMENT NUMBER-DATE

05935 JUN-6 8

FPSC-COMMISSION CLERK

- Issue 4: Does BellSouth's CCS7 Tariff violate Section 364.163, Florida Statutes.
- Issue 5: What does BellSouth charge ALECs under the CCS7 Tariff for intrastate intraLATA and interLATA calls?
- Issue 6: Does BellSouth bill one or multiple Integrated Services Digital Network User Part ("ISUP") messages charges per call?
- (a) If multiple ISUP messages charges per call are billed, what is the basis for applying multiple ISUP messages charges per call?
- Issue 7: Does BellSouth bill ISUP and Transactional Capabilities Application Part ("TCAP") messages charges for BellSouth originated calls, ALEC originated calls or both?
- (a) If both, is it appropriate for BellSouth to bill an ALEC for ISUP and TCAP messages charges for calls that originate on an ALEC's network and terminate on BellSouth's network?
- Issue 8: Does BellSouth's CCS7 Tariff burden the resources of ALECs that interconnect with BellSouth and impede competition by placing ALECs in the position of having to purchase new billing software and equipment to measure and bill CCS7 messages, file access tariffs and rate increases to recover the new charges imposed on ALECs in BellSouth's CCS7 Tariff?
- Issue 9: Does BellSouth bill ILECs for local and intrastate CCS7 messages?
- (a) If not, why not?
- (b) Has BellSouth offered ILECs a bill and keep arrangement for local and/or intrastate CCS7 messages and B-links?

Respectfully submitted,



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CERTIFICATE OF SERVICE

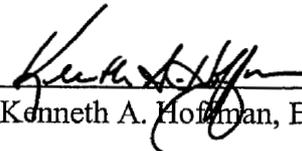
I HEREBY CERTIFY that a copy of the foregoing Proposed Issues was furnished by U. S. Mail to the following this 6 day of June, 2002:

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