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March 30, 2001

Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 4075 Esplanade Way, Room 110 Tallahassee, Florida 32399-0850

RE: Docket No. 000121-TP

Dear Ms. Bayo:

Enclosed for filing on behalf of IDS Telcom, L.L.C., in Docket No. 000121-TP are the original and fifteen copies of IDS Telcom, L.L.C.'s Prehearing Statement. If you have any questions regarding this filing, please call me. Thank you.

Sincerely,

Suzanne F. Summerlin

SFS/wd Enclosures (16)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies

Docket No.: 000121-TP Filed: March 30, 2001

PREHEARING STATEMENT OF IDS TELCOM L.L.C.

IDS Telcom, L.L.C. ("IDS") hereby files this prehearing statement in compliance with the requirements of Order No. PSC-01-0242-PCO-TP, issued January 26, 2001.

A. <u>Known Witnesses</u>. IDS has prefiled the direct testimony of the following witnesses:

Witness

Issues

Keith Kramer

All

William Gulas

ΑII

- B. Known Exhibits: IDS has not prefiled any exhibits at this time.
- C. <u>Basic Position</u>. IDS has experienced tremendous difficulties with the OSS provided by BellSouth for provisioning of both resale and UNEs. IDS has had extensive experience in the use of BellSouth's OSS and has found that BellSouth's OSS continues to cripple IDS' operations and to completely hinder any possibility of the development of competition in the local exchange services market. Any performance measures adopted by the Commission must be easily understandable, enforceable and verifiable, and must provide for serious

ramifications in the event of BellSouth's continued failure to meet its obligations regarding the provision of OSS that are at parity with its internal OSS.

D.-F. <u>Issues and Positions</u>. IDS has no specific position on each of the issues identified in this proceeding beyond the following:

The Florida Public Service Commission should utilize real data regarding BellSouth's performance in such a fashion that BellSouth will be required to provide OSS to each individual ALEC at parity with that provided BellSouth's retail operation. BellSouth must be prohibited from manipulating data regarding its OSS performance. BellSouth must be required to bear substantial financial consequences for its failures to provide OSS to ALECs at parity with the OSS it provides its retail operations.

- **G.** Stipulations. IDS is not aware of any stipulations.
- **H.** <u>Pending Matters</u>. IDS has no pending motions or other matters that require action at this time.

I. Requirements of Order on Procedure. IDS has not identified any requirements of the Order on Procedure that cannot be complied with.

RESPECTFULLY SUBMITTED this 30th day of March, 2001.

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Attorney for IDS Telcom L.L.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prehearing Statement of IDS Telcom, L.L.C., has been furnished by U.S. mail on this 30th day of March, 2001, to:

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