



Public Service Commission  
-M-E-M-O-R-A-N-D-U-M-

**DATE:** January 11, 2002  
**TO:** Blanca Bayó, Director, Division of Commission Clerk and Administrative Services  
**FROM:** Cheryl Bulecza-Banks, Chief, Division of Competitive Markets & Enforcement  
**RE:** CityNet Telecommunications, Inc. Correspondence

Please place the attached correspondence from CityNet Telecommunications, Inc. in Docket File 011077-TL, Generic Investigation Into Whether Competitive Practices of Incumbent and Alternative Local Exchange Carriers Comply With Section 364.01(4)(g), F.S. Thank you.

/CBB

cc: Division of Competitive Markets & Enforcement (Salak, Trapp, Casey, Moses, Wright, Cater)  
Division of Legal Services (F. Banks)

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CMP \_\_\_\_\_  
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OTH \_\_\_\_\_

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CityNet Telecommunications, Inc.  
8403 Colesville Road, 14<sup>th</sup> Floor  
Silver Spring, Maryland 20910

Tel (301) 608-2131

VIA FEDERAL EXPRESS

January 8, 2002

Cheryl Bulecza-Banks  
Division of Competitive Services  
Florida Public Service Commission  
Commission Clerk & Administrative  
Services Division  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

CityNet Telecommunications, Inc. – Docket No. 011077-TP

Dear Ms. Bulecza-Banks:

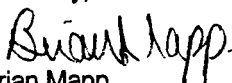
Pursuant to the commission's investigation into competitive practices of Incumbent and Alternative Local Exchange Carriers, CityNet Telecommunications, Inc. submits the enclosed documents providing the prioritization of Section 364.01(4)(g), F.S. competitive practices issues.

The items are prioritized in numerical order, with "1" being the "Most Important" issue, and "34" being the "Least Important" issue listed.

If you have any questions, please call me at 301-608-4018.

Regards,

Sincerely,

  
Brian Mapp  
Corporate Specialist  
Enclosure

cc: Edward Frantz  
Vice President – SEC & Corporate Affairs  
(With enclosure)

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DIVISION OF  
COMPETITIVE SERVICES

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Competitive Practice	Priority Ranking
Refusal to Convert Special Access	34
Sharing of Information Between Retail and Wholesale Units	12
Use of Remote Switches Create a Barrier to Entry	16
Misinformation Provided to Customer Regarding A Competing Carrier	9
Disparaging Comments Made to Customer Regarding a Competing Carrier	8
Unreasonable Engineering Requirements for Conduit Entrance	1
Refusal to Port Numbers To Customer Who Has Switched Carriers	17
Refusal to Transfer Customers With Outstanding Bills	18
Loss of Dial Tone and/or Ancillary Services During the Switch	19
Phone Service Disruptions After the Switch	20
Win-Back Programs	13
Disconnect and New Connect Orders Separated During the Conversion Process	21
LSR Immediately Stamped "Pending Facilities", Even Though Facilities Are Currently In-Service	6
Multiple Billing Errors	7
Escalation Procedures Do Not Result in the Timely Resolution of Issues	4
Establishing Cross Connects Without Permission	2
Caller ID Boxes Do Not Recognize Ported Numbers	22
I.L.E.C Techs Not Properly Trained on New Loop Products, Results in Bad Loops and I.L.E.C Will Not Help Troubleshoot	11
No Dispute Process for a PIC Change	23
I.L.E.C Charging A.L.E.C for PIC Change Yet A.L.E.C is Preparing the Paperwork	24
Prolonged Period of Time Elapses Before I.L.E.C Takes Action to Determine Service Quality Problem	3
Problems with Directory Listing Data Base	25
Power Rates Too High at the Remote Switch (Large Differential From I.L.E.C to I.L.E.C)	14

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Competitive Practice	Priority Ranking
Requirement to Ground the Smart Jacks	26
Refusal to Provide Information Regarding Procedure to Convert from Resale to UNE Pricing	27
Porting of Large or Multiple Business Telephone Numbers Must Be Completed in Multiple Sessions	28
ILEC Does Not Allow Change from Resale to UNE Pricing if a PIC Freeze is on the Account	29
Allows for Expedited Orders in Very Limited Circumstances Even if ALEC is Willing to Pay	5
Performance Measures Don't Apply to Special Access	10
ILEC Sharing Information with Associated CLEC Operations	15
ILEC Fails to Block Calls	30
Customer Account Placed on Hold for 15 Days So They Can't Change to An ALEC	33
After the Switch, an Intercept Message Placed on Customer's Phone Number Indicating the Station Has Been Abandoned	32
ALEC Refuses to Release Customer to an ILEC	31