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November 13, 2002

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

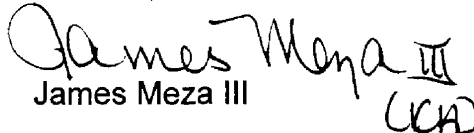
**Re: Docket No.: 020919-TP  
Complaint of AT&T Communications of the Southern  
States, LLC, Teleport Communications Group, Inc., and  
TCG South Florida for Enforcement of Interconnection  
Agreements with BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Proposed Issues, which we ask that you file in the 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,

  
James Meza III  
(LCA)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

DOCUMENT NUMBER-DATE

12440 NOV 13 02

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 020919-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 13th day of November, 2002 to the following:

Patricia Christensen  
Staff Counsel  
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Commission  
Division of Legal Services  
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James Meza, III      (CAD)

**FLORIDA PUBLIC SERVICE COMMISSION**


In re: Complaint of AT&T Communications ) Docket No. 020919-TP  
of the Southern States, LLC, Teleport )  
Telecommunications Group, Inc., and TCG )  
South Florida for Enforcement of )  
Interconnection Agreements with BellSouth )  
Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: November 13, 2002

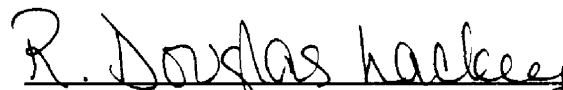
**BellSouth Telecommunications, Inc.'s Proposed Issues**

1. (a) Do the terms of the "Second Interconnection Agreement" as defined in AT&T's complaint apply retroactively from the expiration date of the "First Interconnection Agreement" as defined in AT&T's complaint, June 11, 2000, forward? (b) If the answer to Issue 1(a) is yes, is AT&T entitled to apply all of the terms of the Second Interconnection Agreement from June 11, 2000, forward?
2. Are calls originated or terminated through switched access arrangements included within the "LATAwide" local traffic definition set forth in the "Second Interconnection Agreement?"
3. Do the reciprocal compensation rates set forth in Section 5.3.3.3 of Exhibit 1 to "Second Amendment" to the "Second Interconnection Agreement" apply to calls originated or terminated through switched access arrangements?
4. If the answer to Issue 3 is "yes," has BellSouth breached the "Second Interconnection Agreement?"
5. If the answer to Issue 4 is "yes," what remedies, if any, should the Commission award AT&T?
6. Is BellSouth obligated to charge AT&T, on a going forward basis, the reciprocal compensation rates set forth in Section 5.3.3.3 of Exhibit 1 to "Second Amendment" to "Second Interconnection Agreement" for the transport and termination of calls that originate and terminate within the same LATA but which are originated or terminated through switched access arrangements?

Respectfully submitted this 13<sup>th</sup> day of November, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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