

ORIGINAL

**Matilda Sanders**

**From:** Jean Hawley [jhawley@fh2.com]  
**Sent:** Tuesday, April 26, 2005 12:51 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** 050160-TP MetroPCS California/Florida, Inc.'s Proposed Issues List

**Filed on behalf of:**

**Charles. V. Gerkin, Esq.**  
**Friend, Hudak & Harris, LLP**  
**Attorneys at Law**  
**3 Ravinia Drive, Suite 1450**  
**Atlanta, GA 30346**  
**(770) 399-9500**  
**[cgerkin@fh2.com](mailto:cgerkin@fh2.com)**

**Docket No. 050160-TP**

**Type of filing: MetroPCS California/Florida, Inc.'s Proposed Issues List**

**Filed on behalf of: MetroPCS California/Florida, Inc.**

**No. of pages: 4**

**Description: MetroPCS California/Florida, Inc.'s Proposed Issues List and cover letter**

Jean Hawley  
Telecommunications Paralegal  
Friend, Hudak & Harris, LLP  
Attorneys at Law  
3 Ravinia Drive, Suite 1450  
Atlanta, GA 30346  
(770) 399-9500  
[jhawley@fh2.com](mailto:jhawley@fh2.com)

**\*\*NOTE:** This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to the attorney-privilege or other confidentiality protections. If you are not a designated recipient, you may not review, copy or distribute this message. If you receive this message in error, please notify the sender by reply e-mail and delete this message.

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SEC   1    
OTH   4/26/2005  

DOCUMENT NUMBER - DATE  
**04049 APR 26 03**  
EPSC-COMMISSION CLERK

FRIEND, HUDAK & HARRIS, LLP

ATTORNEYS AT LAW

SUITE 1450

THREE RAVINIA DRIVE

ATLANTA, GEORGIA 30346-2117

(770) 399-9500

FACSIMILE (770) 395-0000

EMAIL: fh2@fh2.com

ORIGINAL

April 26, 2005

VIA ELECTRONIC MAIL

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Florida Public Service Commission  
Room 110, Easley Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

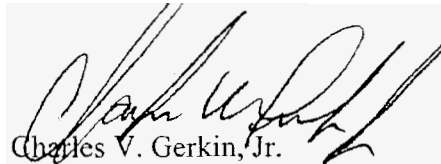
Re: **Petition of MetroPCS California/Florida, Inc. for Interconnection  
Arbitration Against BellSouth Telecommunications, Inc. Pursuant to the  
Telecommunications Act of 1996; Docket No. 050160-TP**

Dear Ms. Bayó:

Enclosed is MetroPCS California/Florida, Inc's Proposed Issues List, which we ask that you file in the above-referenced docket.

Copies have been served to the parties shown on the attached Certificate of Service.

If you have any questions or comments, please call.



Charles V. Gerkin, Jr.

CVG/jh  
Encl.

DOCUMENT NUMBER-DATE

04049 APR 26 13

FDSC-COMMISSION CLERK

ORIGINAL

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In re:

PETITION OF METROPCS  
CALIFORNIA/FLORIDA, INC. FOR  
INTERCONNECTION ARBITRATION AGAINST  
BELL SOUTH TELECOMMUNICATIONS, INC.  
PURSUANT TO THE TELECOMMUNICATIONS  
ACT OF 1996

§  
§  
§  
§  
§  
§  
§

Docket No. 050160-TP

Date Filed: April 26, 2005

METROPCS CALIFORNIA/FLORIDA, INC.'S  
PROPOSED ISSUE LIST

MetroPCS California/Florida, Inc. ("MetroPCS") respectfully submits this Proposed Issues List in anticipation of the Issue Identification Conference in this docket.

**ISSUE 1:** Should BellSouth be permitted to require a deposit from a CMRS carrier whose credit rating is as good as BellSouth's own credit rating?

**ISSUE 2:** Should MetroPCS be permitted to set off undisputed charges owed by BellSouth that are over ninety (90) days past due against amounts that MetroPCS owes BellSouth?

**ISSUE 3:** Should BellSouth be permitted to charge an unregulated, "market-based" rate for transiting traffic from MetroPCS to third party carriers, including CLECs and other ILECs and CMRS carriers?

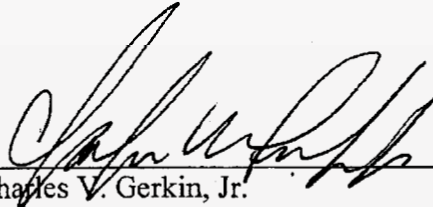
**ISSUE 4:** Should MetroPCS be required to agree to reconfigure its interconnection arrangement in order to relieve congestion at a BellSouth tandem where the parties are interconnected without any assurance that MetroPCS' cost for facilities obtained from BellSouth will not thereby be increased?

DOCUMENT NUMBER-DATE

04049 APR 26 05

FPSC-COMMISSION OF CP

Respectfully submitted this 26<sup>th</sup> day of April, 2005.



Charles V. Gerkin, Jr.  
Georgia State Bar No. 291625  
Brad S. Macdonald  
Georgia State Bar No. 462948

FRIEND, HUDAK & HARRIS, LLP  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346  
770-399-9500 (telephone)  
770-234-5965 (facsimile)  
cgerkin@fh2.com

Patrick K. Wiggins  
Florida State Bar No. 212954  
Georgia State Bar No. 757750

Law Offices of Patrick K. Wiggins, P.A.  
Post Office Drawer 1657  
Tallahassee FL 32302  
850-222-1358 (telephone)  
850-222-1359 (facsimile)  
Email: wigglaw@earthlink.net

*Attorneys for MetroPCS California/Florida,  
Inc.*

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In re:

PETITION OF METROPCS  
CALIFORNIA/FLORIDA, INC. FOR  
INTERCONNECTION ARBITRATION AGAINST  
BELLSOUTH TELECOMMUNICATIONS, INC.  
PURSUANT TO THE TELECOMMUNICATIONS  
ACT OF 1996

§  
§  
§  
§  
§  
§  
§

Docket No. 050160-TP

Date Filed: April 26, 2005

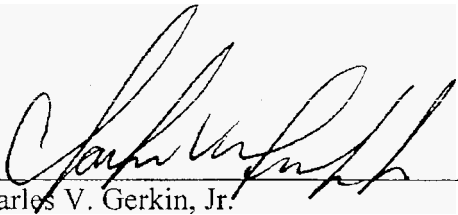
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the following parties VIA electronic mail:

Ms. Nancy White  
General Counsel - Florida  
c/o Ms. Nancy S. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
[Nancy.White@bellsouth.com](mailto:Nancy.White@bellsouth.com)

Andrew D. Shore, Esq.  
Senior Regulatory Counsel  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Room 400  
Tallahassee, Florida 32301  
[Andrew.Shore@bellsouth.com](mailto:Andrew.Shore@bellsouth.com)

Jason Rojas  
Kira Scott  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)  
[kscott@psc.state.fl.us](mailto:kscott@psc.state.fl.us)



Charles V. Gerkin, Jr.

FRIEND, HUDAK & HARRIS, LLP  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346  
770-399-9500 (telephone)  
770-234-5965 (facsimile)