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July 28, 1997

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 960290-TP

Dear Mrs. Bayo:

Pursuant to the Commission's order, PSC-97-0760-FOF-TP, issued June 26, 1997 in the above-mentioned docket, enclosed please find for filing one original and 5 copies of the list of all interconnection agreements between BellSouth Telecommunications, Inc. and the Florida non-Class A independent telecommunications companies. On June 30, 1997, in compliance with the 47 CFR §51-303, BellSouth filed its interconnection agreement with Sprint-Florida, Incorporated.

As stated in the Commission's Order, the Commission's decision to require the filing of a list of all interconnection agreements was largely based upon the Federal Communications Commission's ("FCC") interpretation of the Telecommunications Act of 1996 (the "Act"). The above-mentioned docket was opened as a result of a request from AT&T Communications of the Southern States, Inc., ("AT&T") to require BellSouth and other incumbent local exchange companies to file all existing interconnection agreements pursuant to section 252(a)(1) of the Act. On July 24, 1996, the Commission issued Proposed Agency Action Order No. PSC-96-0959-FOF-TP, ("PAA Order") where it determined that section 252(a)(1) required only the filing of interconnection agreements between competitive carriers in the same geographic markets entered into before or after the enactment of the Act.

On August 8, 1996, the Federal Communications Commission issued its Order in CC Docket 96-98 and required all interconnection agreements with Class A telecommunications companies be filed with the state commissions by June 30, 1997. Based upon the FCC's interpretation of the requirements of section 252(a)(1) of the Act, the PAA Order was protested by MCI Telecommunications and MCImetro Access Transmission Services,

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Inc., ("MCI") and AT&T. On June 26, 1997 the Commission issued the instant Order requiring the filing of the list of all interconnection agreements. The Order relied heavily on the then in effect FCC requirement regarding the filing of pre-existing interconnection agreements. On July 18, 1997, the 8th Circuit Court of Appeals vacated the FCC's requirement as being beyond the jurisdiction of the FCC. The Court stated:

We emphasize that our conclusion that the FCC exceeded its jurisdiction in promulgating Rule 51.303 in no way reflects any view of the merits of the Commission's interpretation of subsection 252(a)(1), and we leave the determination of whether and which preexisting interconnection agreements must be submitted for state commission approval to the state commissions.

In light of the 8th Circuit Court's decision, the Commission is now in the position of determining the requirements of the Act for itself and reaffirming its initial decision of July 24, 1996, over one year ago. In construing the requirements of section 252(a)(1), the Commission determined that:

...the Act only requires that the types of interconnection agreements that are required to be filed with the State commissions are all of those interconnection agreements which an incumbent local exchange carrier has entered into pursuant to the Act. This section, read in context of Part II of the Act, means the types of existing interconnection agreements that must be filed are those interconnection agreements between competitive carriers in the same markets that were entered into before or after the enactment of the Act.

PSC Order No. PSC-96-0959-FOF-TP at 586. The July 24th decision was sound and in accordance with the requirements of the Act.

If the Commission determines that it must be approve the interconnection agreements on the attached lists, BellSouth requests that the schedule for filing of these agreements allow for a period of renegotiation between the affected parties under the Act. The interconnection agreements listed were, as the Commission found, "entered into during the old regime of rate-of-return regulation prior to the passage of the Act....[and] [i]t does not make sense to require those types of agreements to be filed for approval under Section 252 because they were entered into under a different regulatory regime in a non-competitive market." PSC Order No. PSC-96-0959-FOF-TP at page 586. A period of renegotiation would allow the affected parties to

update these interconnection agreement to reflect the requirements of the Act and state regulatory changes.

Thank you for your consideration in this matter.

Sincerely,

Nancy B. White
Nancy B. White
(92)

cc: Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

CERTIFICATE OF SERVICE
Docket No. 960290-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 28th day of July, 1997 to the following:

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Nancy B. White
Nancy B. White (22)

				Date	7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies					
	State	Company	Name (Descr.) of Agreement	Date of Execution	
1	Florida	ALLTEL	Basic Agreement	12/30/83	
2	Florida	ALLTEL	MABC	10/12/88	
3	Florida	ALLTEL	Private Line Services	7/26/88	
4	Florida	ALLTEL	IntraLATA FX	9/16/92	
5	Florida	ALLTEL	Extended Area Service	8/26/93	
6	Florida	ALLTEL	E911 Service	5/8/87	
7	Florida	ALLTEL	CCS7 Interconnection	1/18/93	
8	Florida	ALLTEL	Marion County E-911	3/10/88	

Floralia

Date 7/25/97				
Inventory of Interconnection Agreements with Independent Telephone Companies				
	State	Company	Name (Descr.) of Agreement	Date of Execution
1	Florida	Floralia Tel. Co.	Basic Agreement	3/9/84
2	Florida	Floralia Tel. Co.	MABC	9/14/88
3	Florida	Floralia Tel. Co.	Private Line Services	1/1/88
4	Florida	Floralia Tel. Co.	IntraLATA FX	9/16/92

Frontier-FL

				Date	7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies					
	State	Company	Name (Descr.) of Agreement	Date of Execution	
1	Florida	Frontier	Basic Agreement	1/9/84	
2	Florida	Frontier	MABC	11/4/84	
3	Florida	Frontier	Private Line Services	7/26/88	
4	Florida	Frontier	IntraLATA FX	8/26/93	
5	Florida	Frontier	Extended Area Service	2/2/87	
6	Florida	Frontier	E911 Service	2/2/87	
7	Florida	Frontier	CCS7 Interconnection	5/16/95	

				Date: 7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies				
	State	Company	Name (Descr.) of Agreement	Date of Execution
1	Florida	Gulf Tel. Co.	Basic Agreement	10/19/89
2	Florida	Gulf Tel. Co.	Private Line Services	10/19/89
3	Florida	Gulf Tel. Co.	IntraLATA FX	10/19/89

Indiantown

				Date
				7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies				
	State	Company	Name (Descr.) of Agreement	Date of Execution
1	Florida	Indiantown Tel. System	Basic Agreement	1/5/84
2	Florida	Indiantown Tel. System	MABC	5/22/90
3	Florida	Indiantown Tel. System	Private Line Services	9/13/89
4	Florida	Indiantown Tel. System	Intra-ATA FX	10/22/92
5	Florida	Indiantown Tel. System	Extended Area Service	5/26/92
6	Florida	Indiantown Tel. System	E911 Service	3/6/87
7	Florida	Indiantown Tel. System	CCS7 Interconnection	9/21/94
8	Florida	Indiantown Tel. System	Attachment/Occupancy	8/3/88

Northeast

				Date 7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies				
	State	Company	Name (Descr.) of Agreement	Date of Execution
1	Florida	Northeast Florida Tel. Co.	Basic Agreement	1/7/84
2	Florida	Northeast Florida Tel. Co.	MABC	6/26/89
3	Florida	Northeast Florida Tel. Co.	Private Line Services	7/21/89
4	Florida	Northeast Florida Tel. Co.	Intral ATA FX	9/16/92
5	Florida	Northeast Florida Tel. Co.	Extended Area Service	2/17/94
6	Florida	Northeast Florida Tel. Co.	CCS7 Interconnection	6/3/93

				Date
				7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies				
	State	Company	Name (Descr.) of Agreement	Date of Execution
1	Florida	St. Joseph Tel. Co.	Basic Agreement	1/7/84
2	Florida	St. Joseph Tel. Co.	MABC	9/14/88
3	Florida	St. Joseph Tel. Co.	Private Line Services	7/26/88
4	Florida	St. Joseph Tel. Co.	IntraLATA FX	9/16/92
5	Florida	St. Joseph Tel. Co.	Extended Area Service	10/1/90
6	Florida	St. Joseph Tel. Co.	E911 Service	5/22/89
7	Florida	St. Joseph Tel. Co.	CCS7 Interconnection	7/16/93

TDS-Quincy

				Date: 7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies				
	State	Company	Name (Descr.) of Agreement	Date of Execution
1	Florida	TDS-Quincy Tel. Co.	Basic Agreement	5/8/84
2	Florida	TDS-Quincy Tel. Co.	MABC	12/5/89
3	Florida	TDS-Quincy Tel. Co.	Private Line Services	10/12/88
4	Florida	TDS-Quincy Tel. Co.	IntraLATA FX	9/16/92
5	Florida	TDS-Quincy Tel. Co.	Extended Area Service	10/1/90
6	Florida	TDS-Quincy Tel. Co.	CCS7 Interconnection	10/20/95

Vista

				Date	7/25/97
Inventory of Interconnection Agreements with Independent Telephone Companies					
	State	Company	Name (Descr.) of Agreement	Date of Execution	
1	Florida	Vista-United Tel. Co.	Basic Agreement	3/5/84	
2	Florida	Vista-United Tel. Co.	MABC	6/5/89	
3	Florida	Vista-United Tel. Co.	Private Line Services	6/5/89	
4	Florida	Vista-United Tel. Co.	IntraLATA FX	9/16/92	
5	Florida	Vista-United Tel. Co.	Extended Area Service	6/20/95	