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December 28, 1998

Ms. June McKinney
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 981642-TP - Petition by Intermedia
Communications Inc. for Arbitration with BellSouth
Telecommunications, Inc., pursuant to the
Telecommunications Act of 1996

Docket No. 981745-TP - Petition by e.spire
Communications, Inc. for Arbitration with BellSouth
Telecommunications, Inc., pursuant to the
Telecommunications Act of 1996

LIST OF COMMON ISSUES

Dear June:

As contemplated in the guidelines for a consolidated
arbitration, here is the list of common issues based on the issue
identification meeting held on December 14, 1998.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEA _____
LIR _____
GRI _____
RCH _____
SEC _____
WAS _____
OTH _____

A. Common Issues

- 1. Should BellSouth be required to provide the following items as network elements, features, functions or capabilities?
 - A. Unbundled Loops
 - 1. Two-wire ISDN
 - 2. Two-wire ADSL
 - 3. Two-wire HDSL
 - 4. Four-wire HDSL
 - 5. Four-wire DSO
 - 6. Four-wire DS1
 - 7. DS3
 - 8. OC3
 - 9. OC12
 - 10. OC48



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DOCUMENT NUMBER-DATE

14650 DEC 29 88

FPSC-RECORDS/REPORTING

e.spire only:

11. IDSL
12. SDSL
13. SL1
14. SL2
15. Bit Stream Unbundled Loops

B. Dedicated Interoffice Transport

1. DSO
2. DS1
3. DS3
4. OC3
5. OC12
6. OC48

C. Dedicated Local Channels

1. DSO
2. DS1
3. DS3
4. OC3
5. OC12
6. OC48

D. Packet Switching

1. User-to-Network Interface (UNI)
2. Network-to-Network Interface (NNI)
3. Data Link Control Identifiers (DLCI) at Committed Information Rates (CIRs)

E. Channelization/Multiplexing

F. Remote Terminals/Remote Terminal Equipment

H. Dark Fiber

1. Loops
2. Dedicated Interoffice Transport
3. Dedicated Local Channel

I. Enhanced Extended Link (EEL)

J. Loop Feeder (e.spire only)

K. Loop Distribution (e.spire only)

2. What should be the rates, terms and conditions for the items considered in Issue 1 to be network elements, features, functions, or capabilities?
3. Should BellSouth be required to provide UNE combinations? If so, what should be the rates?
4. Should BellSouth be required to convert resale services to UNEs for current customers? If so, what should be the rates, terms, and conditions? **NEEDS TO BE REWORDED**
5. Should BellSouth be required to provide volume and term pricing for unbundled network elements and resold services? If so, what should be the rates, terms, and conditions of the specific unbundled network elements and resold services requested?
6. Should BellSouth be required to provide pricing parity? If so, what should be the terms and conditions? **NEEDS TO BE REWORDED**
7. What should be the rates, terms, and conditions for physical collocation?
8. What should be the rates, terms, and conditions for virtual collocation?
9. Should BellSouth be required to provide the following collocation arrangements? If so, what should be the rates, terms, and conditions?
 - A. Shared caged collocation
 - B. Cageless collocation
 - C. Remote Terminal
 - D. Other
10. Is BellSouth required to allow Intermedia/e.spire to interconnect with other ALECs also collocated in a BellSouth central office? If so, what should be the rates, terms, and conditions?
11. What performance measures should be included in the parties' respective agreements?
12. Should penalty provisions be included in the parties' respective agreements? If so, what penalties should be imposed?

13. a) What should be the appropriate reciprocal compensation rate level for transport and termination of local traffic?
- b) For purposes of reciprocal compensation, should the definition of local traffic include traffic that originates from or terminates to an Enhanced Service Provider (ESP) or Information Service Provider (ISP)? If so, what are the appropriate reciprocal compensation rate levels for ESP and ISP traffic?
14. What number portability requirements should be included in the parties' respective agreements?
15. What Frame Relay requirements should be included in the parties' respective agreements?

B. Intermedia's Proposed Rewording of Issues 4 and 6

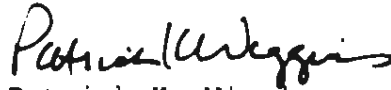
As reflected in the note accompanying Issues 4 and 6 above, they need to be reworded. Intermedia's suggested rewording follows. Neither BellSouth nor e.spire object to this rewording, although BellSouth maintains its objection to these and certain other issues being included for determination by the Commission.

4. Should BellSouth be required to convert special access services purchased from BellSouth's tariff to unbundled network elements for current customers? If so, what should be the rates, terms, and conditions?
6. Where BellSouth and Intermedia/e.spire are bidding for services for the same end-user, should BellSouth provide the same rates, terms, and conditions to Intermedia/e.spire for wholesale unbundled network elements and resold services that it provides to itself or an affiliate on a retail basis?

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If you have any questions about this, please do not hesitate to call. Thank you for your assistance in this matter.

Sincerely,



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