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Legal Department

NANCY B. WHITE
General Counsel-Florida

99 FEB -1 PM 3:59

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

February 1, 1999

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980119-TP

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Notice of Supra Telecommunications and Informations Systems, Inc., which we asked 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.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,

Nancy B. White
Nancy B. White (NBW)

NBW:jn
Enclosure

cc: All parties of record
Marshall M. Criser III
William J. Ellenberg II

ACK _____
AFA _____
APP Calderon
CAF _____
CMU 1
CTR _____
EAG _____
LEG 1
LN 3
DPC _____
RCH _____
SEC 1
VAS _____
OTH _____

DOCUMENT NUMBER-DATE

01252 FEB-1 99

FPSC-RECORDS/REPORTING


CERTIFICATE OF SERVICE
Docket No. 980119-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
Federal Express this 1st day of February, 1999 to the following:

Beth Keating, Esq.
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199

Mark E. Buechele, Esq.
Supra Telecommunications and
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4220
Fax. No. (305) 476-4282

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375


Nancy B. White
Nancy B. White (PW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications) Docket No.: 980119-TP
and Information Systems, Inc., Against)
BellSouth Telecommunications, Inc.) Filed: February 1, 1999

**BELLSOUTH's RESPONSE TO NOTICE
OF SUPRA TELECOMMUNICATIONS and INFORMATION SYSTEMS, INC.**

BellSouth Telecommunications, Inc., hereby responds to the Notice filed by Supra Telecommunications and Information Systems, Inc. ("Supra") on December 28, 1998 and received by BellSouth on January 11, 1999. In support thereof, BellSouth states the following:

1. On December 28, 1999, Supra filed notice pursuant to Section 120.69(1)(b)(1), Florida Statutes that BellSouth had failed or refused to comply with Order No. PSC-98-1001-FOF-TP issued on July 22, 1998 and Order No. PSC-98-1467-707-TP issued on October 28, 1998. BellSouth denies these allegations.

2. In Order No. PSC-98-1001-FOF-TP, issued on July 22, 1998, the Florida Public Service Commission ordered BellSouth to, among other items, (1) identify to Supra which USOC codes are discounted and which are not and to the extent that BellSouth's electronic interfaces provide information or automatically populate fields with USOC codes, to provide this same capability to Supra through the ordering interfaces available to Supra; (2) provide Supra with all of BellSouth's central office addresses or otherwise work with Supra to find a solution for the reservation of telephone numbers for Remote Call forwarding service; (3) retrain BellSouth's employees on the proper procedures for handling

DOCUMENT NUMBER-DATE

01252 FEB-1 99

PSC-REG/REG/REPORTING

ALEC repairs and Inside Wire Maintenance problems; (4) provide Supra with any outstanding documentation requested by Supra; and (5) modify the ALEC ordering systems to provide the same online edit checking capability to Supra that BellSouth's retail ordering systems provide (Order, pp. 45-46).

3. It should be noted that, on August 6, 1998, BellSouth filed for reconsideration of Order No. PSC-98-1001-FOF-TP. BellSouth sought reconsideration of the online edit checking capability issue. Order No. PSC-98-1467-FOF-TP, issued on October 28, 1998 denied reconsideration on that issue. On November 25, 1998, BellSouth filed a complaint with the United States District Court, Northern District of Florida, Case No. 4:98cv404-RH concerning the online edit checking capability issue. In its prayer for relief, BellSouth sought injunctive relief from the enforcement of the Commission's order on this issue.

4. In its Motion for Reconsideration, BellSouth also advised the Commission of its actions on each of the findings to be implemented, with BellSouth seeking clarification where needed. With regard to the automatic population of fields with USOC Codes, BellSouth advised that only its retail residential system (RNS) performs this function. BellSouth further advised that LENS performs this function and EDI does not and that BellSouth believed it was in compliance. In its response to BellSouth's Motion, Supra did not object and the Commission did not comment.

5. With the exception of the online edit checking capability (which is on appeal), BellSouth has complied with the Orders. On August 19, 1998, Marcus Cathey of BellSouth forwarded via U.S. Mail to Mr. Ramos of Supra

approximately 4000 pages of discounted USOCs and over 200 pages of non-discounted USOCs, as well as a list of the BellSouth central office addresses for Florida. A copy of the letter is attached as Exhibit 1 (only a sample page of the USOC codes is attached hereto because of their voluminous nature). Supra denied that it had received this information and, therefore, the letter and enclosures were resent on September 22, 1998 via Federal Express. A copy of the Federal Express airbill signed for by M. Pardee of Supra is attached hereto as Exhibit 2.

6. On August 19, 1998, Mr. Cathey wrote to Mr. Ramos concerning the outstanding documentation referred to in the Orders. A copy of the correspondence is attached hereto as Exhibit 3 (again, only a sample of the error message pages is attached).

7. On November 24, 1998, in response to an August 31, 1998 letter from Mr. Ramos, Mr. Cathey advised Mr. Ramos of BellSouth's compliance with regard to the outstanding documentation required by the Order. BellSouth had advised the Commission in BellSouth's Motion for Reconsideration of BellSouth's compliance in the provision of edits used by LEO and LESOG, the location of the SOCS edits, the technical reference manuals, the LERG, electronic communications, and API documentation. With regard to PLATS, the Commission, in Order No. PSL-98-1467-FOF-TP, clarified that BellSouth should provide PLATS on a per request basis, subject to a protective agreement between the parties. A copy of Mr. Ramos' letter of August 31, 1998 is attached hereto as Exhibit 4 and Mr. Cathey's response is attached hereto as Exhibit 5.

8. BellSouth completed the retraining of its employees on the proper procedures for handling ALEC repairs and inside wire maintenance problems by the end of August, 1998.

WHEREFORE, BellSouth is in compliance with the Commission's Orders in the above captioned docket.

Respectfully submitted this 14 day of February, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White
NANCY B. WHITE (for)
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5558

William J. Ellenberg II
WILLIAM J. ELLENBERG II (for)
675 West Peachtree Street, #4300
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BellSouth Interconnection Services
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Birmingham, Alabama 35203

205 321-4900
Fax 205 321-4334
Pager 1 800 946-4846 PIN 2295881
Internet
Marcus.B.Cathey@bridge.bst.bls.com

Marcus B. Cathey
Sales Assistant Vice President
CLEC Interconnection Sales

August 19, 1998

Mr. Olukayode A. Ramos
Chief Executive Officer
Supra Telecommunications & Information Systems, Inc.
2620 SW 27th Avenue
Miami, FL 33133-3001

Dear Mr. Ramos,

The purpose of this letter is to provide you with information on BellSouth USOCs and Central Office addresses. BellSouth is hereby providing Supra with a list of USOCs and indicating which ones are discounted on a resale basis and which ones are not discounted. BellSouth is also providing Supra with the BellSouth central office addresses for Florida. You will find enclosed with this letter each of these lists.

I trust this information fulfills Supra's need in regards to these two requests. If you have any further questions, please call Kevin Davis, Account Manager, at 205-321-4947.

Regards,

Marcus Cathey

Enclosures

EXHIBIT 1

CRIS RATE DATA BASE EXTRACTION REPORT
USOC - USOCS NOT DISCOUNTABLE FLA

JOB 0001810Y
JES 0 J001200
RUN DATE 01/15/99
RUN TIME 16155945
PAGE 1

FORM NP-6118
SITE JAX -2PC
CPU ID Y15Y
PROGRAM FSS0200
VERSION 10/20/98 10.32.33
THIS FORM IS DOCUMENTED IN CRIS USER GUIDE

USOC	SVC	DATA
ADLL1	1+0	N
ADLL1	2+0	N
ASEFA	1+0	N
ASDFC	1+0	N
ASDFL	1+0	N
ASEFP	1+0	N
ASGFS	1+0	N
ASGSL	1+0	N
ATRLX	++0	N

LETT DESCRIPTION

ADSL Virtual Circuit with Data Rates up to 1.5 Mbps Downstream and up to 254 Kbps Upstream, Provisioning Only

ADSL Virtual Circuit with Data Rates up to 1.5 Mbps Downstream and up to 254 Kbps Upstream, Provisioning Only

Lifeline Credit, TANF, Federal

Lifeline Credit, Food Stamps, Federal

Lifeline Credit, LINEAP, Federal

Lifeline Credit, Federal Public Housing, Federal

Lifeline Credit, SSI, Federal

Lifeline Credit, Medicaid, Federal

KIDMAX Amplified Telephone Ring

NOTICE: NOT FOR USE OR DISCLOSURE OUTSIDE BELLSOUTH EXCEPT UNDER WRITTEN AGREEMENT

01/15/99 16:16

ADDRESS

CLLI	STREET	CITY	ZIP
ARCHFLMARS0	307 W ALABAMA AV	ARCHER	32818
BCCHFLNRS0	314 BOCA CHICA NAS	KEY WEST	33040
BCRTFLBBS0	800 BROKEN SOUND PKWY NW	BOCA RATON	33487
BCRTFLBTD0	5140 CONGRESS AV	BOCA RATON	33487
BCRTFLBTR0	5140 CONGRESS AV	BOCA RATON	33487
BCRTFLMAD0	838 S DIXIE HWY	BOCA RATON	33486
BCRTFLBAD0	8407 GLADES RD	BOCA RATON	33434
BQIFLMARS0	1 AHN OVERSEAS HWY	BIG PINE KEY	33043
BKVLFLJFDS0	201 E JEFFERSON ST	BROOKSVILLE	34801
BLDWFLMARS0	155 W DREW ST	BALDWIN	32234
BLGLFLMAD0	108 SW AVENUE C	BELLE GLADE	33430
BNNFLMARS0	111 S CHERRY ST	BUNNELL	32010
BRSNFLMARS0	211 CAPITAL ST	BRONSON	32821
BYBHFLMAC0	221 SE 4TH ST	BOYNTON BEACH	33435
BYBHFLMAD0	221 SE 4TH ST	BOYNTON BEACH	33435
CCBHFLAFRS0	12 AHN NASA PKWY	CAPE CANAVERAL	32809
CCBHFLMAD0	450 ORANGE AVE.	COCOA BEACH	32831
CDKYFLMARS0	734 3RD ST	CEDAR KEY	32828
CFLDFLMARS0	112 SE 18T AV	CHIEFLAND	32828
CHPLFLJADS0	205 W RAILROAD AV	CHIPLEY	32428
CNTMFLLED0	521 MUSCOGEE RD	CANTONMENT	32533
COCOFLMAD0	712 FLORIDA AV	COCOA	32922
COCOFLMED0	125 MUSTANG WAY	MERRITT ISLAND	32853
CSCYFLBAR0	25 AHN BARBER AV	CROSS CITY	32828
DBRYFLDLD0	1204 PROVIDENCE BLVD	DELTONA	32713
DBRYFLMARS1	113 S U S HWY 17-82	DEBARY	32713
DELDFLMAD0	316 W NEW YORK AV	DELAND	32720
DLBHFLKPRS0	8037 W ATLANTIC AV	DELRAY BEACH	33448
DLBHFLKP49E	8037 W ATLANTIC AV	DELRAY BEACH	33448
DLBHFLMARS0	321 SE 2ND ST	DELRAY BEACH	33489
DLBHFLMA27E	321 SE 2ND ST	DELRAY BEACH	33489
DLSPFLMARS0	108 E BERLIN ST	DELEON SPRINGS	32130
DNLNFLWMRS0	12080 S WILLIAMS ST	DUNNELLON	34432
DRBHFLMAD0	780 S DEERFIELD AV	DEERFIELD BEACH	33441
DYBHFLFNRS0	1881 MASON AV	DAYTONA BEACH	32117
DYBHFLMAD0	268 N RIDGEWOOD AV	DAYTONA BEACH	32114
DYBHFLQBD0	22 S RIDGEWOOD AV	ORMOND BEACH	32174
DYBHFLQSR0	1776 OCEAN SHORE BLVD	ORMOND BEACH	32014
DYBHFLPOD0	829 ORANGE AV	PORT ORANGE	32119
EGLLFLBGDS0	1750 CROTON RD	MELBOURNE	32935
EGLLFLIHDS0	980 PINE TREE DR	INDIAN HARBOUR BEACH	33457
EORNFLMARS0	19544 E COLONIAL DR	ORLANDO	32835
FLBHFLMARS0	210 S DAYTONA AV	FLAGLER BEACH	32138
FRBHFLFPDS0	2100 S 8TH ST	FERNANDINA BEACH	32034
FTGRFLMARS0	8451 HECKSCHER DR	FORT GEORGE	32226
FTLDFLAPRC0	401 SW 40TH ST	FT LAUDERDALE	33318
FTLDFLCR50E	2630 E OAKLAND PARK BLVD	FORT LAUDERDALE	33308

ADDRESS

FTLDFLCYD80	5365 NE 14TH AV	FORT LAUDERDALE	33334
FTLDFLJADS0	10141 W BROWARD BLVD	PLANTATION	33324
FTLDFLMRDS0	211 NE 2ND ST	FORT LAUDERDALE	33301
FTLDFLDADS0	4200 W OAKLAND PARK BLVD	LAUDERDALE LAKES	33313
FTLDFLPLDS0	4036 BRYAN BLVD	PLANTATION	33317
FTLDFLSGDS0	14000 NW 6TH ST	SUNRISE	33325
FTLDFLSU21	8750 W OAKLAND PARK BLVD	SUNRISE	33351
FTLDFLSU74E	8750 W OAKLAND PARK BLVD	SUNRISE	33351
FTLDFLWNS0	1431 BONAVENTURE BLVD	FORT LAUDERDALE	33326
FYPRFLMACG0	712 CITRUS AV	FT PIERCE	34660
FYPRFLMARS0	712 CITRUS AVENUE	FORT PIERCE	34660
QCSPFLCNS0	512 CENTER ST	GREEN COVE SPRINGS	32043
QCVLFLMARS0	6370 CLIFF ST	GRACEVILLE	32440
QENVFLMARS0	173 1ST ST	GENEVA	32732
QLBRFLMCDS0	98 MCCLURE DR	GULF BREEZE	32561
QSVLFLMADS0	400 SW 2ND AV	GAINESVILLE	32601
QSVLFLMADS1	400 SW 2ND AV	GAINESVILLE	32601
QSVLFLNW33E	7825 NW 6TH PL	GAINESVILLE	32607
HAVNFLMADS0	111 SE 1ST ST	HAVANA	32833
HBSDFLMADS0	11500 SE DIXIE HWY	HOBE SOUND	33445
HLNVFLMADS1	1810 HIGHWAY 87 S	NAVARRE	32560
HLWDFLHA45E	120 NE 12TH AV	HALLANDALE	33008
HLWDFLMADS0	715 N FEDERAL HWY	HOLLYWOOD	33020
HLWDFLPEDS0	61 NW 96TH AV	PEMBROKE PINES	33024
HLWDFLWHDS0	250 S 62ND AV	HOLLYWOOD	33023
HMSTFLAFRS0	364 HOMESTEAD AIR FORCE BASE	HOMESTEAD	33030
HMSTFLARS0	2850 N CANAL DR	HOMESTEAD	33036
HMSTFLHMS0	75 CIVIC CT	HOMESTEAD	33030
HMSTFLNARS0	14475 SW 284TH ST	HOMESTEAD	33032
HTISFLMADS0	10980 S OCEAN DR	JENSEN BEACH	34867
HWTFLMARS0	21 NW 1ST ST	HAWTHORNE	32840
ISLMFLMARS0	62680 OVERSEAS HWY	ISLAMORADA	33038
JAY-FLMARS0	107 NORTH CHERRY ST	JAY	32545
JCBHFLABRS0	13625 ATLANTIC BLVD	JACKSONVILLE	32228
JOBHFLMA24E	1824 N 3RD ST	JACKSONVILLE BEACH	32250
JCBHFLSPRS0	3370 THALIA RD	JACKSONVILLE	32250
JCVLFLARDS0	7553 ATLANTIC BLVD	JACKSONVILLE	32211
JCVLFLBWD0	11917 BEACH BLVD	JACKSONVILLE	32216
JCVLFLCLDS0	424 N PEARL ST	JACKSONVILLE	32202
JCVLFLFCD0	6664 FT CAROLINE RD	JACKSONVILLE	32277
JCVLFLIARS0	1550 AIRPORT RD	JACKSONVILLE	32218
JCVLFLJTRS0	4500 SALISBURY RD	JACKSONVILLE	32218
JCVLFLLF76E	1441 W EDGEWOOD AV	JACKSONVILLE	32208
JCVLFLNOD0	6602 NORMANDY BLVD	JACKSONVILLE	32208
JCVLFLWDS0	11741 N MAIN ST	JACKSONVILLE	32218
JCVLFLRV38E	1710 TALBOT AV	JACKSONVILLE	32208
JCVLFLSJ73E	6234 ST AUGUSTINE RD	JACKSONVILLE	32217
JCVLFLSMDS0	2048 HENDRICKS AV	JACKSONVILLE	32207
JCVLFLWCD0	5528 JAMMES RD	JACKSONVILLE	32210

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ADDRESS

JPTRFLMA74E	112 SEMINOLE AV	JUPITER	33477
KYHGFLMARS0	70 SW MAGNOLIA AV	KEYSTONE HEIGHTS	32868
KYLRFLLSRS0	102500 OVERSEAS HWY	KEY LARGO	33037
KYLRFLMARS0	96000 OVERSEAS HWY	KEY LARGO	33037
KYWBFLMADS0	630 SOUTHARD ST	KEY WEST	33040
LKCYFLMADS0	130 W NASSAU ST	LAKE CITY	32025
LKMRFLABRS0	400 RINEHART RD	LAKE MARY	32748
LKMRFLMADS0	365 INTERNATIONAL PKWY	HEATHROW	32748
LYHNFLOHDS0	812 OHIO AVE	LYNN HAVEN	32444
MCNPFLMARS0	101 NE 3RD AV	MICANOPY	32867
MDBGFLPMD50	3908 MAIN ST	MIDDLEBURG	32068
MIAMFLAEDS0	116 ALHAMBRA CIR	CORAL GABLES	33134
MIAMFLAERS0	116 ALHAMBRA CIR	CORAL GABLES	33134
MIAMFLAGRS0	1221 BRICKELL AV	MIAMI	33131
MIAMFLAL83E	2470 NW 38TH ST	MIAMI	33142
MIAMFLAPDS0	5275 NW 38TH ST	MIAMI SPRINGS	33166
MIAMFLBA85E	2010 SW 17TH AV	MIAMI	33146
MIAMFLBCDS0	251 NW 29TH ST	MIAMI	33127
MIAMFLBRDS0	1560 LENOX AV	MIAMI BEACH	33139
MIAMFLCADS0	2301 SW 100TH AV	MIAMI	33166
MIAMFLCCK21	444 NW 78TH AV	MIAMI	33138
MIAMFLDBR51	8405 OLD DIXIE HWY	MIAMI	33164
MIAMFLFLDS0	2105 W FLAGLER ST	MIAMI	33135
MIAMFLGRDS0	45 NW 5TH ST	MIAMI	33126
MIAMFLGRDS1	45 NW 5TH ST	MIAMI	33126
MIAMFLHLD50	1245 W 69TH ST	HALEAH	33014
MIAMFLIC88E	8800 HARDING AV	MIAMI BEACH	33141
MIAMFLKEDS0	89 WESTWOOD DR	KEY BISCAYNE	33149
MIAMFLMERS0	1380 NW 21ST ST	MIAMI	33142
MIAMFLME32E	1380 NW 21ST ST	MIAMI	33142
MIAMFLNMDS0	1380 NE 127TH ST	MIAMI	33161
MIAMFLNSDS0	2815 NW 70TH ST	NORTH MIAMI	33147
MIAMFLOL88E	2880 NW 137TH ST	MIAMI	33147
MIAMFLPB88E	25 NAKKODA DR	OPA LOCKA	33084
MIAMFLPLDS0	6058 NW 41ST ST	MIAMI SPRINGS	33166
MIAMFLPLRS0	8056 NW 41ST ST	MIAMI	33178
MIAMFLRRDS0	6100 SW 57TH AV	MIAMI	33178
MIAMFLSH75E	8451 NE 1ST AV	MIAMI	33145
MIAMFLSO59E	10701 SW 88TH ST	MIAMI	33138
MIAMFLWDD80	15000 SW 88TH ST	MIAMI	33178
MIAMFLWM26E	1165 SW 67TH AV	MIAMI	33178
MICCFLBRS0	720 W EGRET CIR	WEST MIAMI	33144
MLBRFLMADS0	728 PALMETTO AV	BAREFOOT BAY	33078
MLTNFLRAD50	307 RAVINE ST	MELBOURNE	32901
MNDRFLAVDS0	8923 WESTERN WAY	MILTON	32570
MNDRFLLODS0	11499 ST AUGUSTINE RD	JACKSONVILLE	32258
MNDRFLWRS0	877 STATE ROAD 13 N	MANDARIN	32218
MNSNFLMARS0	11886 MUNSON HWY	JACKSONVILLE	32218
MRTFLVRS0	61 COCO PLUM DR	MILTON	32591
		MARATHON	33050

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ADDRESS

MXVFLMARS0	8455 MAXVILLE BLVD	JACKSONVILLE	32254
NOADFLAC84E	2100 NE 164TH ST	NORTH MIAMI BEACH	33162
NOADFLBRD50	18580 NW 27TH AV	MIAMI	33058
NOADFLGGDS0	18400 NE 5TH AV	MIAMI	33178
NOADFL0L93E	18251 NE 26TH AV	MIAMI	33180
NKLRFLMARS0	7008 AHN STATE ROAD 805	NORTH KEY LARGO	33037
NSBHFLMA42E	100 CANAL ST	NEW SMYRNA BEACH	32158
NWBYFLMARS0	410 NW 1ST AV	NEWBERRY	32888
OKHLFLMARS0	153 BELL AV	OAK HILL	32788
OLTWFLNRS0	11 AHN MC*QUEEN AV	OLD TOWN	32880
ORLDFLAPDS0	7320 LAKE UNDERHILL RD	ORLANDO	32803
ORLDFLCLDS0	2315 E CENTRAL BLVD	ORLANDO	32803
ORLDFLCLDS1	2315 E CENTRAL BLVD	ORLANDO	32803
ORLDFLMADS1	45 N MAGNOLIA AV	ORLANDO	32801
ORLDFLMA42E	45 N MAGNOLIA AV	ORLANDO	32801
ORLDFLPCDS0	8821 S ORANGE AV	ORLANDO	32808
ORLDFLPHDS0	5120 SILVER STAR RD	ORLANDO	32819
ORLDFLSADS0	4858 W SAND LAKE RD	ORLANDO	32819
ORPKFLMA28E	150 MC*INTOSH AV	ORANGE PARK	32073
ORPKFLRWDS0	721 BLANDING BLVD	ORANGE PARK	32068
OVIDFLCADS0	84 S CENTRAL AV	OVIDO	32765
PACEFLPVR50	4381 HIGHWAY 90	PACE	32871
PAHKFLMARS0	828 E MAIN ST	PAHOKEE	33478
PCBHFLNTDS0	804 NAUTILUS ST	PANAMA CITY BEACH	32413
PLC8FLMADS0	5 CLUB HOUSE DR	PALM COAST	32037
PLTKFLMADS0	318 MAIN ST	PALATKA	32177
PMBHFLCSD50	8420 ROYAL PALM BLVD	CORAL SPRINGS	33085
PMBHFLFECG0	1230 N FEDERAL HWY	POMPANO BEACH	33062
PMBHFLMADS0	1180 BANKS RD	COCONUT CREEK	33063
PMBHFLNPRS0	1551 N POWERLINE RD	POMPANO BEACH	33068
PMBHFLTA0S0	7800 N UNIVERSITY DR	TAMARAC	33512
PMPKFLMARS0	212 WORCHESTER RD	POMONA PARK	32081
PNCYFLCAR50	8809 HIGHWAY 22	PANAMA CITY	32404
PNCYFLMADS0	111 E 5TH ST	PANAMA CITY	32401
PNSCFLBL43E	30 W BELMONT ST	PENSACOLA	32501
PNSCFLFPDS0	1725 E OLIVE RD	PENSACOLA	32514
PNSCFLHCRS0	8915 PINE FOREST RD	PENSACOLA	32508
PNSCFLPBDS0	5575 LARIMER AV	PENSACOLA	32507
PNSCFLWADS0	515 S OLD CARRY FIELD RD	PENSACOLA	32507
PNVDFLMADS0	637 A1*A NORTH	PONTE VEDRA BEACH	32082
PRRNFLMADS0	18845 S DIXIE HWY	MIAMI	33157
PRSNFLFDRS0	114 N FOUNTAIN DR	PIERSON	32080
PTSLFLMADS0	450 SW IRVING ST	PORT SAINT LUCIE	34983
PTSLFLS0CG0	2002 SE PORT ST LUCIE BLVD	PORT SAINT LUCIE	34982
SBSTFLFERS0	7 S BAY ST	FELLSMERE	32948
SBSTFLMADS0	1137 U S HIGHWAY 1	SEBASTIAN	32958
SGKYFLMARS0	3178 AHN OVERSEAS HWY	SUGARLOAF KEY	33042
SNFRFLMADS0	501 W 8TH ST	SANFORD	32771
SNFRFLMADS1	501 W 9TH ST	SANFORD	32771

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ADDRESS

BTAGFLBSRS0	10 OWENS AV	SAINT AUGUSTINE	32084
BTAGFLMADS0	89 CORDOVA ST	SAINT AUGUSTINE	32084
BTAGFLSHRS0	4480 U S 1	SAINT AUGUSTINE	32088
BTAGFLWGRS0	4875 STATE ROAD 18	SAINT AUGUSTINE	32092
STRFLMADS0	300 W 3RD ST	STUART	34984
BYHSFLCCRS0	617 COUNTRY CLUB DR	LYNN HAVEN	32444
TRENFLMARS0	213 NW FIRST ST	TRENTON	32688
TTVLFLMADS0	620 S HOPKINS AV	TITUSVILLE	32788
VERNFLMARS0	108 COURT ST	VERNON	32482
VRBHFLBER80	750 BEACHLAND BLVD	VERO BEACH	32989
VRBHFLMADS0	1878 18TH AV	VERO BEACH	32989
WELKFLMARS0	721 3RD AV	WELAKA	32183
WPBHFLANRS0	325 GARDENIA ST	WEST PALM BEACH	33401
WPBHFLAN83E	325 GARDENIA ST	WEST PALM BEACH	33401
WPBHFLGADS0	3800 S MILITARY TR	LAKE WORTH	33463
WPBHFLGRDS0	3700 R*C*A BLVD	PALM BEACH GARDENS	33410
WPBHFLHHDS0	1550 N HAVERHILL RD	WEST PALM BEACH	33417
WPBHFLHHR80	1800 N HAVERHILL RD	WEST PALM BEACH	33417
WPBHFLLE80	120 N K ST	LAKE WORTH	33460
WPBHFLLE58E	120 N K ST	LAKE WORTH	33460
WPBHFLRB84E	3840 AVENUE E	RIVIERA BEACH	33404
WPBHFLRPDS0	11455 SOUTHERN BLVD	ROYAL PALM BEACH	33409
WWSPFLHIDS0	9401 CORTEZ BLVD	BROOKSVILLE	34813
WWSPFLSHDS0	1385 DELTONA BLVD	SPRING HILL	34808
YNFNFLMARS0	12102 AZALEA ST	FOUNTAIN	32438
YNTWFLMARS0	4 AHN W HWY 40	YANKEETOWN	34488
YULEFLMARS0	1839 AHN N HIGHWAY 17	YULEE	32087

FedEx USA Airbill

807548145242

9/25 9:51 AM
0210
TH. PARDEE

SNA12
Sender's Copy

From (please print and press hard)

Date: 9/22/98 Sender's FedEx Account Number: 1887-3984-5

Sender's Name: Kevin Davis Phone: 205-321-4947

Company: BELLSOUTH INTERCONNECTION SVCS

Address: 600 N 19TH ST 9TH FLR Dept./Plant/Division:

City: BIRMINGHAM State: AL ZIP: 35203

Your Internal Billing Reference Information: 935

To (please print and press hard)

Recipient's Name: Mr. Olukayode Ramos Phone: 305 476-4220

Company: Supra Telecom

Address: 2620 S.W. 27th Avenue (No Carrier Delivery in PO Boxes or PO ZIP Codes) Dept./Plant/Division:

City: Miami State: FL ZIP: 33133

For **WORLD** at FedEx Location check here: Mail Stop Mail Stop Mail Stop

For **INTERNATIONAL** Delivery check here: International International International

1 Express Package Service Packages under 25 lbs. Delivery guaranteed on the next business day.

FedEx Priority Overnight FedEx Standard Overnight

FedEx First Overnight

FedEx 2Day FedEx Express Saver

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FedEx Overnight Freight FedEx 2Day Freight FedEx Express Saver Freight

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4 Special Handling Fragile High Value Signature Required Restricted Access

5 Payment Sender Recipient Third Party Credit Card Cash

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Sender's Declaration: Sender certifies that the contents of this bill are true and correct. Sender certifies that the contents of this bill are true and correct. Sender certifies that the contents of this bill are true and correct.

Recipient's Declaration: Recipient certifies that the contents of this bill are true and correct. Recipient certifies that the contents of this bill are true and correct. Recipient certifies that the contents of this bill are true and correct.

Questions? Call 1-800-Go-FedEx 1-800-469-3333

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006120305 3

321

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EXHIBIT 2

01/15/99 16:16



BellSouth Interconnection Services 205 321-4900
9th Floor Fax 205 321-4334
600 North 19th Street Pager 1 800 946-4646 PIN 2295861
Birmingham, Alabama 35203 Internet
Marcus.B.Cathy@bridge.bat.bls.com

Marcus B. Cathy
Sales Assistant Vice President
CLEC Interconnection Sales

August 19, 1998

Mr. Olukayode A. Ramos
Chief Executive Officer
Supra Telecommunications & Information Systems, Inc.
2620 SW 27th Avenue
Miami, FL 33133-3001

Dear Mr. Ramos,

The purpose of this letter is to provide you with information on PLATS, the LERG, API/TAG and reject requirements. As you know, these are the specific areas of documentation that were mentioned in the Florida PSC's Order in Docket 980119-TP.

It is my understanding that John Chaucer, Specialist-BellSouth Network, provided your company with a copy of BellSouth's standard License Agreement for Pole Attachments and/or Conduit and Right of Way Occupancy in a letter dated July 7, 1998, addressed to Angel M. Leiro and a letter dated August 5, 1998, addressed to you. Upon the final execution of this agreement, Supra can then make application to obtain copies of records and subsequently either attached to or occupy BellSouth structures.

The LERG is a document that Bellcore maintains and updates frequently. It will be necessary for Supra to contact Bellcore directly to subscribe to the LERG. The contact number on Bellcore's website is 732-699-6700.

API or TAG (Telecommunications Access Gateway) allows Supra to build its own presentation layer to access BellSouth's operational support systems for pre-ordering and ordering functions. Included with this letter is a presentation that will give you an overview of TAG. I have included the TAG specifications in this package of material. These specifications are quite technical in nature and are BellSouth's confidential business information. Thus, these specifications are being provided to you pursuant to Section 9, Treatment of Proprietary and Confidential Information of Supra's Interconnection Agreement. Because of the technical nature of the TAG document and the possibility of misunderstanding, BellSouth believes it appropriate to answer all questions concerning the platform or specifications through a formal training class. The dates for the training class are as follows: October 6-7, 1998, Atlanta, GA; November 3-4, 1998, Atlanta, GA; and December 8-9, 1998, Birmingham, AL. Please contact Kevin Davis at 205-321-4947 to enroll your representative in this class.

EXHIBIT 3

02/01/99

12:12

305 577 4491
BELLSOUTH LEGAL FLA → 850 222 8640

NO. 052 P10
NO. 796 P003/010

01/15/99 16:16

On the issue of reject requirements, I believe this information was provided to you on June 8, 1998, when you visited BellSouth's office. Nonetheless, to be certain you have the information, I am enclosing the list of edits used by LEO and LESOG. Also, the edits used by SOCS are available on the Internet at www.interconnection.bellsouth.com/socredit/soer_doc.htm (the username and password are both "socredits.") If this is not the information you seek, please let us know and we will be happy to work with you to get whatever available information you need.

Mr. Ramos, your Account Manager, Kevin Davis, is more than willing to work with you in providing such information to you. Kevin may be reached on 205-321-4947.

Regards,


Marcus Cathey

Enclosures

02/01/99 12:12
01/18/99 16:58
BELLSOUTH LEGAL FLA + 850 222 8640
305 577 4491

Changes since last release in Boldface

ERROR SEVERTY

CODE LEVEL ERROR MESSAGE TEXT

CODE	LEVEL	ERROR MESSAGE TEXT
1001	R	CCNA MUST BE 3 ALPHAS
1005	R	CCNA REQUIRED WHEN REQ TYP = A OR B EXCEPT ON ACT TYPE SS, RS, W
1007	R	DUPLICATE CC, PON, VER
1010	R	PON REQUIRED
1012	R	CANNOT SUPP A PREVIOUSLY CANCELED LSR/PON
1015	R	PON DUPLICATE ON INITIAL LSR
1017	R	PON VALID VALUES ARE UPPER CASE ALPHA A THRU Z, NUMERIC 0 THRU 9, AND SYMBOLS . , - ' ^
1020	R	VER REQUIRED FOR SUPS
1022	R	LSR ORIGINATING SOURCE NOT SAME AS PRIOR VERSION
1023	R	NO ORIGINAL LSR FOUND FOR THIS SUP
1025	R	VER MUST BE GREATER THAN PREVIOUS VERSION
1027	R	PREVIOUS LSR AGED OFF - (K) STATUS
1030	R	VER MUST BE TWO NUMERICS - 01 OR GREATER FOR 860'S
1032	R	VER MUST BE SPACES OR 00(ZEROS) FOR 850
1035	R	SERVICE CENTER REQUIRED
1040	R	SERVICE CENTER MUST BE 4 A/N CHARACTERS
1045	R	D/SENT - D/SENT CENTURY - FIELDS REQUIRED
1050	R	D/SENT - D/SENT CENTURY MUST BE CURRENT OR FUTURE DATE
1060	R	D/SENT - D/SENT CENTURY MUST BE A VALID DATE
1065	R	DDD/DDO-CC REQUIRED
1070	R	DDD/DDO-CC MUST BE CURRENT OR FUTURE DATE
1080	R	DDD/DDO-CC MUST BE A VALID DATE
1085	R	DDDO-CC/DDDO MUST BE CURRENT OR FUTURE DATE
1095	R	DDDO-CC/DDDO MUST BE A VALID DATE
1100	R	DFDT REQUIRED WHEN THE CRC FIELD IS POPULATED
1105	R	CRC ONLY VALID ENTRY IS Y
1110	R	INVALID REQ TYP - ACCOUNT ACTIVITY TYPE COMBINATION
1115	R	REQ TYP REQUIRED
1120	R	REQ TYP INVALID
1130	R	ACTIVITY TYPE REQUIRED
1135	R	ACTIVITY TYPE VALID ENTRIES MUST BE A, C, W, T, D, R, V, RS, SS, W

1140 R SUP VALID ENTRIES: 01, 02, 03
1145 R SUP PROHIBITED ON INITIAL REQUEST
1150 R SUP PROHIBITED WHEN 1ST CHARACTER OF REQ TYP FIELD CHANGES
1155 R EXPEDITE ONLY VALID ENTRY = Y
1160 R HTR REQUIRED
1170 R CC REQUIRED
1172 R CC MUST BE 4 ALPHANUMERIC
1175 R ASNG ONLY VALID ENTRY = Y
1180 R ALBR ONLY VALID ENTRY = Y
1185 R SCA ONLY VALID ENTRY = Y
1190 R AGAUTE ONLY VALID ENTRY = Y
1205 R DATED-CC/DATED REQUIRED WHEN AGAUTE FIELD IS POPULATED
1210 R DATED-CC/DATED MUST BE A VALID DATE
1215 R ACTL MUST BE 11 ALPHANUMERIC CHARACTERS
1220 R LST MUST BE 11 ALPHANUMERIC CHARACTERS
1225 R LST REQUIRED WHEN REQ TYP = P
1230 R LSO MUST BE 6 NUMERICS
1235 R TOS REQUIRED
1240 R TOS INVALID
1245 R SPEC MUST NOT BE POPULATED WITH ALPHA I OR NUMERIC 0
1250 R SPEC INVALID - MUST BE 5 A/N OR 7 A/N
1255 R NC MUST BE 4 ALPHANUMERIC CHARACTERS
1260 R NCI REQUIRED WHEN NC FIELD IS POPULATED
1265 R NCI MUST BE A MINIMUM OF 5 ALPHANUMERIC CHARACTERS
1270 R SECNCI MUST BE A MINIMUM OF 5 ALPHANUMERIC CHARACTERS
1272 R REON VALID VALUES ARE UPPER CASE ALPHA A THRU Z, NUMERIC 0 THRU 9, AND SYMBOLS . , -
1275 R LSPAUTE MUST BE 4 ALPHANUMERIC CHARACTERS
1285 R LSPAUTE DATE/LSPAUTE DATE-CC REQUIRED WHEN LSPAUTE FIELD IS POPULATED
1290 R LSPAUTE DATE/LSPAUTE DATE-CC MUST BE A VALID DATE
1295 R LSPATENAME REQUIRED WHEN LSPAUTE FIELD IS POPULATED
1300 R CIC REQUIRED ON THIS REQ TYP-ACT TYP COMBINATION
1305 R CIC MUST BE 4 NUMERICS
1310 R COST REQUIRED WHEN COND = COS
1315 R BIL REQUIRED WHEN MORE THAN ONE EON FIELD IS POPULATED
1320 R BIL MUST BE VALID ENTRY OF A, D, L, M, P, R, U, V, W, Z
1325 R BANI REQUIRED

02/01/99 12:12 305 577 4491
01/18/99 16:58 BELLSOUTH LEGAL FLA → 850 222 8640
NO. 052 P12
NO. 019 P004/004

Revised for electronic transmission

Phone: (305) 443-3710
Fax: (305) 443-1078
2620 SW 27th Avenue
Miami, FL 33133
Email: sales@stis.com
www.stis.com

STIS

Supra Telecom & Information Systems, Inc.

August 31, 1998

Via Federal Express

Mr. Marcus B. Cathey
Sales Assistant Vice President
CLEC Interconnection Sales
BellSouth Interconnection Services
9th Floor, 600 North 19th Street
Birmingham, Alabama 35203

SUPRA'S CRY FOR COMPLIANCE TO THE RULE OF LAW BY BELLSOUTH

Dear Mr. Cathey,

I am in receipt of your letter dated August 19, 1998 that was supposedly written to address the issues raised in the Florida Public Service Commission (FPSC) Order Number PSC - 98 - 1001 - FOF - TP dated July 22, 1998. We have also had two telephone conversations on these issues.

Mr. Cathey, I believe it is in BellSouth's interest to show some appreciation and respect to this great country by complying with the applicable laws. If BellSouth chooses to do otherwise, it is only appropriate that you inform the regulatory bodies that are properly constituted by law to manage the affairs of this industry. Your letter of August 19th fails to address the FPSC Orders and is consequently designed to stall the development of competition to the detriment of the American consumers.

PLATS

BellSouth's standard License Agreement for Pole Attachments and/or Conduit and Rights of Way Occupancy sent to us by Mr. John Chaucer did not address the issue of PLATS as expressed by you during one of our conversations. As a matter of fact, BellSouth's Assistant General Counsel, Ms. Nancy B. White, in her Motion for Reconsideration and Clarification of that particular order pleaded for a reconsideration of the ruling stating that PLATS "are voluminous and considered proprietary by BellSouth"¹ As far as we know, PLATS (also known as FAAR) are available on CD-ROM and our request is within the requirements of the TA, the accompanying FPSC Order, and the Code of Federal Regulations (CFR).

EXHIBIT 4

¹ BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, page 8.

Code of Federal Regulations, Part 47, Section 51.5, Terms and Definitions, reads:

Pre-ordering and ordering. "Pre-ordering and ordering" includes the exchange of information between telecommunications carriers about current or proposed customer products and services or unbundled network elements or some combination thereof.

Provisioning. "Provisioning" involves the exchange of information between telecommunications carriers where one executes a request for a set of products and services or unbundled network elements or combination thereof from the other with attendant acknowledgements and status reports.²

While Section 51.301 (c) reads:

(B) refusing to provide information necessary to reach agreement. Such refusal includes, but is not limited to:

- (i) refusal by an incumbent LEC to furnish information about its network that a requesting telecommunications carrier reasonably requires to identify the network elements that it needs in order to serve a particular customer; and
- (ii) refusal by a requesting telecommunications carrier to furnish cost data that would be relevant to setting rates if the parties were in arbitration.³

Consequently, the request for PLATS by Supra from BellSouth is reasonable and within the law as contained in the FPSC Order.

Application Programmer Interface

With regard to Application Programmer Interface (API), the information about Total Access Gateway (TAG) that you have sent to Supra does not meet our requirements. Supra's request for API is intended to enable our developers to produce applications that will work with BellSouth's Regional Negotiations Systems (RNS) in order to expedite certain tasks. Thus Supra needs the API documentation for the RNS. Moreover, our developers have been informed that the TAG is not even available today for Supra's use!

In Ms. White's response to the FPSC Order, BellSouth stated that they are "preparing a protective agreement for signature by Supra since this documentation

² Code of Federal regulations, Telecommunication, 47, Parts 40 to 69, Revised as of October 1, 1997, page 19.

³ Code of Federal regulations, Telecommunication, 47, Parts 40 to 69, Revised as of October 1, 1997, page 26.

contains intellectual property".⁴ We still await the protective agreement for our review and execution.

Database Documentation

The database documentation that Supra referred to in its complaint before the FPSC is the database documentation for RNS. This is a reference manual of the architecture of the RNS and contains a description of every table used by RNS with descriptions of fields, rules, triggers, indexes, and related information. We will also need the RNS System Administration Guide, and Technical Reference manuals.

USOCs

The FPSC's Order also required BellSouth to provide Supra with a list of the discounted and non-discounted USOCs. That Order reads:

BellSouth shall identify to Supra which USOC codes are discounted and which are not. Also, to the extent that BellSouth's electronic interfaces provide information or automatically populate fields with USOC codes, BellSouth shall provide this same capability to Supra through the ordering interfaces available to Supra⁵.

In Ms. White's response to the FPSC Order, BellSouth stated that "it should be noted that only BellSouth's retail residential system (RNS) performs this function⁶".

Supra knows that it is only RNS that performs this capability and that is why we have requested for RNS.

Central Office Addresses

We await BellSouth's compliance with the FPSC Order as agreed to by Ms. White in her Motion for Reconsideration.

Training of BellSouth's Employees

We are still experiencing serious problems with both BellSouth's Service Representatives and Repair Technicians. The problems we identified in our complaint before the FPSC still exist.

Online Edit Check

The FPSC Order reads:

⁴ BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, page 8.

⁵ FPSC Order No. PSC - 98 - 1001 - FPF - TP, Docket No. 980119 - TP dated July 22, 1998, Page 47. VII (2).

⁶ BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, page 6.

BellSouth shall modify the ALEC ordering systems so that the systems provide the same online edit checking capability to Supra that BellSouth's retail ordering systems provide.⁷

BellSouth's Ms. White in her motion for reconsideration stated that 'in order to provide the exact same edit checking capability that BellSouth's retail ordering systems provide, BellSouth would be required to place computer hardware and software on the premises of the ALEC. This would entail an enormous amount of investment in both time and money'.⁸

As a measure of good gesture on Supra's part, we are willing to fund the necessary investments to be made for the installation of the systems.

Reservation and Assignment of Telephone Numbers

The Florida Order reads:

BellSouth shall provide Supra with the ability to reserve the same number of telephone numbers through LENS as BellSouth can through RNS. BellSouth shall also modify LENS to automatically assign a telephone number to an end user when the customer's address is validated⁹.

In BellSouth's motion for reconsideration, Ms. White noted that "the LENS update to add this feature will be in place by February, 1999¹⁰". However, we both know that RNS can perform those functions now!

Outstanding Documentation

The Florida PSC reads:

BellSouth shall provide any outstanding documentation requested by Supra¹¹.

⁷ FPSC Order No. PSC - 98 - 1001 - FPF - TP, Docket No. 980119 - TP dated July 22, 1998, Page 47, VII (5).

⁸ BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, Page 5.

⁹ FPSC Order No. PSC - 98 - 1001 - FOF - TP, Docket No. 980119 - TP dated July 22, 1998, Page 47, VII (3).

¹⁰ BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, Page 7.

¹¹ FPSC Order No. PSC - 98 - 1001 - FOF - TP, Docket No. 980119 - TP dated July 22, 1998, Page 48, VII (8).

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The following is a list of outstanding documentation which Supra requires from BellSouth:

- Technical Reference manuals on all the Unbundled Network Elements that have been identified by BellSouth;
- Training manuals used by BellSouth to train its LCSC Service Representatives;
- Attendance by Supra's Service Reps. Of the same training that BellSouth provides to its LCSC Service Reps.

UNE Combo

At a meeting between Supra's General Counsel (Ms. Summerlin) and BellSouth's Assist. General Counsel (Ms. White), BellSouth agreed to provide Supra UNE combos on a test basis. Once again, we beg you to honor this commitment.

UNE Rates for Interoffice Transport

On April 29, 1998, Supra's Mr. D. Nilson made a formal request to BellSouth's Mr. Pat Finley for some specific UNES. To date, BellSouth has failed to furnish those rates to Supra. To add insult to injury, a letter was received from BellSouth signed by Ms. Patricia C. Warner informing us that BellSouth has abandoned all treatment of that request. A copy of the letter is attached.

Mr. Cathey, you are aware of how crucial this information is to Supra at this stage as we invest in our network deployment! You are aware that without the supply of those rates by BellSouth, we cannot move forward with our "Joint Network Planning Meeting" which has been stalled for two months because of the fact that Supra is awaiting UNE rates from BellSouth.

Conclusion

I will like to conclude this letter by addressing some of the peripheral issues raised in BellSouth's motion for reconsideration. In that motion, BellSouth made an affirmative statement that both BellSouth and Supra, at various times, filed a request for approval at the FPSC for its Resale, Collocation and Interconnection Agreements. The truth is that BellSouth did all these filings without Supra being unaware that these documents were been filed and that is why there are some disputes as to the genuiness of the documents filed by BellSouth as they conflict with the documents the undersigned appended his signature. As you know, CLECS sign only one page out of a 500-page document and the documents are returned to BellSouth to counter sign.

BellSouth has stated in its Motion for Reconsideration that:

6

The Commission erred in deciding an issue that was not part of this docket and which neither BellSouth nor Supra addressed.¹²

According to the Telecommunications Act of 1996, Section 257 quoted below:

SEC. 257. MARKET ENTRY BARRIERS PROCEEDING.

(a) **ELIMINATION OF BARRIERS** - Within 15 months after the date of enactment of the Telecommunications Act of 1996, the Commission shall complete a proceeding for the purpose of identifying and eliminating, by regulations pursuant to its authority under this Act (other than this section), market entry barriers for entrepreneurs and other small businesses in the provision and ownership of telecommunications services and information services, or in the provision of parts or services to providers of telecommunications services and information services.

(b) **NATIONAL POLICY** - In carrying out subsection (a), the Commission shall seek to promote the policies and purposes of this Act favoring diversity of media voices, vigorous economic competition, technological advancement, and promotion of the public interest, convenience, and necessity.¹³

Our Interconnection Agreement with BellSouth discussed parity at all levels extensively including but not limited to Ordering and Provisioning. As you know, LENS is by no means comparable with RNS. Therefore, BellSouth's insistence that Supra continue using the substandard LENS is contrary to the spirit of the Interconnection Agreement.

In conclusion, Please note that Supra cannot compete with BellSouth until BellSouth resolves these issues. The importance of the access to RNS cannot be over emphasized. We are very afraid of what is going to happen to our company, as we do not know what to expect from BellSouth from day to day.

The future of the TA, our company and its staff members, competition in the local loop, and the benefits of competition to the American telephone subscribers is at stake. We beseech you to obey the laws of the country and

¹² BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, page 5.

¹³ Telecommunications Act of 1996, Section 257.

7

respect the ruling of constituted authorities to the benefits of the average American consumers.

Sincerely,

Signed: Olukayode A. Ramos

Olukayode A. Ramos
Chairman and CEO

CC:

Governor Lawton Chiles, Governor of Florida
Senator Connie Mack, United States Senate
Hon. Carrier Meek, United States Congress
Hon. Joel I. Klein, United States, Assl. Attorney General
Chairman William Kennard, FCC
Mr. Don Russell, Chief, Telecommunications Task Force, DOJ
Ms. Dorothy Attwood, Chief, Enforcement Division, FCC
Hon. Bob Butterworth, State Attorney General
Mr. Walter D'Haeseleer, Director, The Florida Public Service Commission
Ms. Sally Simmons, The Florida Public Service Commission
Mr. Wayne Stavanja, The Florida Public Service Commission



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

205 321-4900
Fax 205 321-4334
Pager 888 787-5123
Internet
Marcus.B.Cathey@bridge.bst.bls.com

Marcus B. Cathey
Sales Assistant Vice President
CLEC Interconnection Sales

November 24, 1998

Mr. Olukayode A. Ramos
Chief Executive Officer
Supra Telecom and Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133

Dear Mr. Ramos:

This is in response to your letter dated August 31, 1998, which was written regarding BellSouth's compliance with the Florida Public Service Commission (FPSC) order # PSC-98-1001-FOF-TP dated July 22, 1998. We have already spoken about several of these issues, but I have waited to respond in writing pending the FPSC decision on BellSouth's Motion for Reconsideration and Clarification. BellSouth's responses do "address the FPSC order" and I assure you it is neither BellSouth's intent "to stall the development of competition" nor has its actions in any way impeded the development of competition. BellSouth has been one of the most vocal proponents of the Telecommunications Act of 1996 ("the Act") and, since the Act became law, BellSouth has moved swiftly to facilitate competition within our region. Specifically, BellSouth has gone to great lengths to accommodate Supra Telecommunications and Information Systems ("Supra") requests.

Set out below are BellSouth's positions regarding the various issues raised by Supra:

PLATS

Attachment 8, "Rights-of-Way, Conduits and Pole Attachments" of the Interconnection Agreement between Supra and BellSouth states:

BellSouth agrees to provide Supra Telecommunications and Information Systems, Inc., pursuant to 47 U.S.C. § 224, as amended by the Act, nondiscriminatory access to any pole, duct, conduit, or right-of-way owned or controlled by BellSouth pursuant to terms and conditions that are subsequently negotiated with BellSouth's Competitive Structure Provisioning Center.

One of the "terms and conditions" of the Pole Attachment Agreement, which was sent to you on August 5, 1998, by Mr. John Chaucer addresses access to PLATS. It should be noted that Supra

has not returned a signed copy of the agreement to BellSouth. It should do so promptly. Section 5.2 of that agreement states:

Provision of Records and Information to Licensee. In order to obtain information regarding facilities, Licensee shall make a written request to BellSouth, identifying with reasonable specificity to geographic area for which facilities are required, the types and quantities of the required facilities and the required inservice date. In response to such request, BellSouth shall provide Licensee with information regarding the types, quantity and location (which may be provided by provision of route maps) and availability of BellSouth poles, conduit and right-of-way located within the geographic area specified by Licensee. Provision of information under the terms of this section shall include the right of Licensee employees or agents to inspect and copy engineering records or drawings which pertain to those facilities within the geographic area identified in Licensee's request. Such inspection and copying shall be done at a time and place mutually agreed upon by the parties. See Appendix II for records location centers.

Only a portion of BellSouth's facility maps has been converted to optical images. Where that conversion has not been made, BellSouth will provide paper copies of maps. But, as Ms. Nancy White stated in BellSouth's Motion for Reconsideration, PLATS "records are voluminous and considered proprietary by BellSouth." This is the reason for Ms. White's request for clarification and her suggestion "that the Commission require BellSouth to provide access of the records on a narrowly tailored request basis when necessary for a particular reason" and that "BellSouth would provide such access within a reasonable time." The FPSC has agreed with BellSouth on this issue in its decision on BellSouth's Motion for Reconsideration and Clarification.

Application Programming Interface (API)

In reference to BellSouth's Regional Negotiation System (RNS), you state:

Supra's request for API is intended to enable our developers to produce applications that will work with BellSouth's Regional Negotiations Systems (RNS) in order to expedite certain tasks.

Based on this statement, there is obvious confusion on Supra's behalf as to what RNS is. RNS is nothing more than a graphical user interface that BellSouth developed for its service representatives to input residential orders. RNS was designed to fit BellSouth's specific business needs, contains proprietary information, does not follow the industry standards that have been established for CLEC ordering, and does not support access to the most basic types of CLEC resale orders, such as "switch-as-is" and "switch-with-changes." BellSouth does not have any plans to make RNS available to CLECs and the FPSC has stated that RNS does not need to be made available. Instead, BellSouth has developed three electronic interfaces for CLEC ordering, Electronic Data Interchange (EDI), the Telecommunications Access Gateway (TAG), and the Local Exchange Navigation System (LENS). These interfaces support regional ordering for both business services, which I understand is Supra's focus, and residential services. TAG, formerly known as API, was developed by BellSouth to assist CLECs in building their own order entry system. BellSouth has invested significant resources into this product, at the request of CLECs, in

order for CLECs to customize order entry to their specific needs and functions to integrate pre-ordering and ordering functions. TAG will also allow CLECs to integrate the ordering, pre-ordering functions with their own internal Operations Support Systems, such as billing.

TAG became operational for pre-ordering functions on August 30, 1998, and ordering capabilities were added on November 1, 1998. BellSouth offers a training course in TAG and classes were held in October and November 1998. The next class begins on December 8, 1998, in Birmingham, Alabama. This 2-day class provides information and instructions to CLEC programmers, with C++ programming knowledge, to prepare them to design and develop client applications for the BellSouth TAG. I invite you to contact 1-888-404-9899 if you are interested in registration for this class.

Database Documentation

There is no need or requirement for BellSouth to provide documentation on RNS due to the reasons described above. Further, this documentation would be of no benefit to Supra. If Supra's intention is to build its own order entry system to interface with BellSouth's order processing systems, TAG and EDI are the available mechanisms to achieve that goal.

USOCs and Central Office Addresses

BellSouth attempted to supply Supra with a list of the USOCs that are discounted, a list of those that are not, as well as a list of central office addresses. However, the package containing this information was returned to BellSouth. The information was sent again, and it is my understanding that it was received by Supra on September 23, 1998.

Training of BellSouth's Employees

Per the FPSC order, BellSouth has trained its retail service representatives and technicians on the proper end user contact procedures. Should you identify specific allegations of violations, BellSouth will research them and take appropriate action. BellSouth will need specific account information, including name of customer, telephone number and address to investigate the allegation.

On-Line Edit Check

BellSouth is committed to providing CLECs an efficient and easy to use on-line order entry system. BellSouth continues to make enhancements to LENS and EDI as well as to provide alternative online order entry systems such as TAG.

Reservation and Assignment of Telephone Numbers

As previously mentioned, BellSouth's LENS is continually being upgraded to add additional capabilities. The current schedule to increase the quantity of telephone numbers reserved at a time

11/25/98 17:37

in LENS in the inquiry made from 6 to 25 is November 14, 1998. CLECs can reserve an unlimited number of telephone numbers in LENS.

Outstanding Documentation

BellSouth has provided or made available to Supra and all CLECs the Technical Reference manuals that exist for UNEs. BellSouth will not provide to Supra, or any other CLEC, the training manuals used by the LCSC service representatives because they are confidential to BellSouth and would be of no value to Supra. Nor will BellSouth provide Supra service representatives the same training LCSC service representatives attend because, again, it would be of no value to Supra, as the systems used by BellSouth are different and more complicated than LENS. BellSouth has provided to Supra all documents required by the FL PSC.

UNE Combo

Ms. Nancy White did not agree to provide Supra UNE Combos on a test basis. As BellSouth has stated many times before, it will be happy to negotiate an agreement with Supra whereby BellSouth would provide combinations of unbundled network elements to Supra and Supra would pay for the component parts plus a professional services fee for BellSouth combining the elements for Supra.

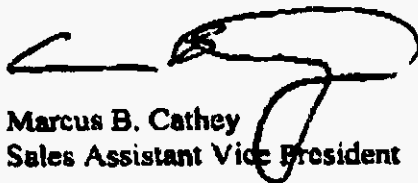
UNE Rates for Interoffice Transport

This request was answered in earlier correspondence dated October 14, 1998. See attached for reference.

Conclusion

I trust this letter, taken together with our previous conversations and correspondence, has addressed each of your concerns. Should you have any questions, please contact me at 205.321.4900.

Sincerely,



Marcus B. Cathey
Sales Assistant Vice President

Attachment