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Legal Department

NANCY B. WHITE  
General Counsel-Florida

99 APR 26 PM 4:35

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

RECORDS AND  
REPORTING

April 26, 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 (Supra Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Compliance and Request for Approval of its Compliance with Order No. PSC-98-1001-FOF-TP, which we ask that you file in the captioned docket.

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 (KR)

Nancy B. White

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

AFA  
APP Bellak  
CAF  
CMU Favors  
CTR  
EAG  
LEG Meeting  
MAS  
OPC  
RRR  
SEC 1  
WAW  
OTH

DOCUMENT NUMBER-DATE

05349 APR 26 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 26th day of April, 1999 to the following:

Beth Keating  
Legal Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
Tel No. (850) 413-6199  
Fax No. (850) 413-6250

David V. Dimlich, Esq.  
Legal Counsel  
Supra Telecommunications &  
Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4235  
Fax. No. (305) 443-1078

Nancy B. White (KR)  
Nancy B. White

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: April 26, 1999

**NOTICE OF COMPLIANCE AND REQUEST  
FOR APPROVAL OF BELL SOUTH TELECOMMUNICATIONS, INC.'S  
COMPLIANCE WITH ORDER NO. PSC-98-1001-FOF-TP**

BellSouth Telecommunications, Inc. (BellSouth), pursuant to Rule 28-106.201 of the Florida Administrative Code, hereby files its Notice of Compliance and Request for Approval of BellSouth's Compliance with Order No. PSC-98-1001-FOF-TP. In support thereof, BellSouth states the following:

1. In Order No. PSC-98-1001-FOF-TP, issued on July 22, 1998, the Florida Public Service Commission (the "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 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).

2. 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.

3. 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.

4. 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 nondiscounted 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.

5. 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).

6. 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.

7. 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.

8. On March 15, 1999, Supra filed a Complaint with the Eleventh Judicial Circuit Court, Case No. 99-6532-CA08. Supra asked the state court to

enforce the Commission's Orders. On April 5, 1999, BellSouth filed its Motion to Dismiss Supra's Complaint for lack of subject matter jurisdiction.

9. BellSouth is in complete compliance with the Commission's Orders and seeks approval of that compliance. BellSouth believes it is in the Commission's purview to rule on this request due to the Commission's expertise in this area. A ruling from the Commission that BellSouth is compliant will render BellSouth's appeal unnecessary and Supra's Complaint moot.

10. As noted above, the sole issue upon which BellSouth was not compliant at the time of BellSouth's Motion for Reconsideration involved the online edit checking capability the Commission ordered. Specifically, in Order No. PSC-98-1001-FOF-TP, the Commission specifically ordered BellSouth to provide an ALEC ordering system providing the same online edit checking capability to Supra that BellSouth's retail ordering systems provide.

11. In Order No. PSC-98-1467-FOF-TP, the Commission clarified its ruling, stating that "... BellSouth does not need to provide the exact same interfaces that it uses." (Page 14). Specifically, the Commission held that "BellSouth shall provide Supra with the same interaction and online edit checking capability through its interfaces that occurs when BellSouth's retail ordering interfaces interact with BellSouth's FUEL and SOLAR databases to check orders." (Page 19).

12. BellSouth has complied with the Commission's Orders in this instance by creating and deploying a new ALEC pre-ordering and ordering interface called the Telecommunications Applications Gateway ("TAG"). This

interface allows the ALEC to submit orders to BellSouth that are edited online using the same edits and same capabilities that are applied to BellSouth retail orders by FUEL and SOLAR. (Page 13). TAG does not require BellSouth to duplicate its RNS and DOE interfaces at Supra's premises. It does require Supra to install certain software, to perform some programming, and to attend education on TAG provided by BellSouth. This interface was deployed commercially on November 1, 1998. Several ALECs have begun to use this interface commercially in the past sixty days.

14. BellSouth notified all ALECs in Florida prior to November 1, 1998 of the availability of TAG. Indeed, Supra is in the process of implementing the TAG interface and has already participated in training classes.

15. BellSouth asserts that this Commission has continuing jurisdiction over enforcement of and compliance with its Orders. BellSouth further, asserts that if the Commission confirms BellSouth's compliance with the Commission's Orders, BellSouth will no longer have the need to proceed with its federal appeal and Supra's state court Complaint will be moot. BellSouth has no objection to an evidentiary hearing on this issue.

WHEREFORE, BellSouth asserts that it is compliant with the Commission's Orders in this Docket, and requests that the Commission so find, after an evidentiary hearing, if one is required.

Respectfully submitted this 26th day of April, 1999

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KE)

NANCY B. WHITE  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
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(305) 347-5558

William J. Ellenberg (KE)

WILLIAM J. ELLENBERG  
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160833





BellSouth Interconnection Services  
6th Floor  
600 North 19th Street  
Birmingham, Alabama 35203

205 321-4929  
Fax 205 321-4324  
Pager 1 800 946-4646 PIN 2206001  
Internet  
Marcus.B.Cathey@bridge.bellsouth.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,

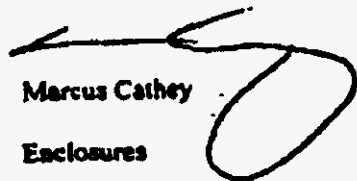
  
Marcus Cathey  
Enclosures

EXHIBIT 1

FORM NP-4118  
 SITE JAN -DPC  
 CPU ID Y15Y  
 PROGRAM PERFORMED  
 VERSION 10/20/90 10.12.93  
 THIS FORM IS DOCUMENTED IN CRIS UNCS ONLINE

CRIS DATA BASE EXTRACTION REPORT  
 UNCS - UNCS OUT RECOVERABLE FLA

JOB 001010T  
 RES 0 001200  
 RUN DATE 02/15/99  
 RUN TIME 14:33:45  
 PAGE 1

UNCS	UNCS	DATA
ABLL	1-0	N
ABLL	2-0	N
ABFA	1-0	N
ABFC	1-0	N
ABFL	1-0	N
ABFP	1-0	N
ABFS	1-0	N
ABSI	1-0	N
ABSL	1-0	N

LEFT DESCRIPTION

ABLL Virtual Circuit with Data Rates up to 1.5 Gbps Downstream and up to 254 Gbps Upstream, Provisioning Only

ABLL Virtual Circuit with Data Rates up to 1.5 Gbps Downstream and up to 254 Gbps Upstream, Provisioning Only

ABFA Lifeline Credit, TANF, Federal

ABFC Lifeline Credit, Food Stamps, Federal

ABFL Lifeline Credit, LEAD, Federal

ABFP Lifeline Credit, Federal Public Housing, Federal

ABFS Lifeline Credit, SSI, Federal

ABSI Lifeline Credit, Medicaid, Federal

ABSL Enhanced Amplified Telephone Ring

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

02/01/99 01/18/99 10:17  
 BELLSouth LEGAL FLA + BOX 444  
 10:00 Page 2/002

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
BCRTFLBRS0	800 BROKEN SOUND PKWY NW	BOCA RATON	33487
BCRTFLBTS0	5140 CONGRESS AV	BOCA RATON	33487
BCRTFLBTR61	5140 CONGRESS AV	BOCA RATON	33487
BCRTFLMAD61	838 S DIXIE HWY	BOCA RATON	33488
BCRTFLBAD90	8407 GLADES RD	BOCA RATON	33488
BOPIFLMARS0	1 AHN OVERSEAS HWY	BIG PINE KEY	33043
BKVLFLJFD80	201 E JEFFERSON ST	BROOKSVILLE	34801
BLDWFLMARS0	156 W DREW ST	BALDWIN	32234
BLGLFLMAD50	108 SW AVENUE C	BELLE GLADE	33430
BRNLFLMARS0	111 S CHERRY ST	BUNNELL	32010
BRNFFLMARS0	211 CAPITAL ST	BRONSON	32021
BYBHFLMACG0	221 SE 4TH ST	BOYNTON BEACH	33435
BYBHFLMAD50	221 SE 4TH ST	BOYNTON BEACH	33435
CCBHFLAFRS0	12 AHN NASA PKWY	CAPE CANAVERAL	32908
CCBHFLMAD50	450 ORANGE AVE.	COCOA BEACH	32931
CDKYFLMARS0	734 3RD ST	CEDAR KEY	32920
CFLOFLMARS0	112 SE 18T AV	CHIEFLAND	32528
CHPLFLJAD50	208 W RAILROAD AV	CHIPLEY	32530
CNTMFLLED51	521 MUSCOGEE RD	CANTONMENT	32532
COCOFLMAD50	712 FLORIDA AV	COCOA	32902
COCOFLMED80	125 MUSTANG WAY	MERRITT ISLAND	32953
CSCYFLBARS0	25 AHN BARBER AV	CROSS CITY	32828
DBRYFLDLD80	1204 PROVIDENCE BLVD	DELTONA	32713
DBRYFLMARS1	113 S U S HWY 17-82	DEBARY	32913
DELDFLMAD50	318 W NEW YORK AV	DELAND	32720
OLBHFLKPRS0	6037 W ATLANTIC AV	DELRAY BEACH	33448
OLBHFLKPA9E	6037 W ATLANTIC AV	DELRAY BEACH	33448
OLBHFLMARS0	321 SE 2ND ST	DELRAY BEACH	33448
OLBHFLMA27E	321 SE 2ND ST	DELRAY BEACH	33448
OLSPFLMARS0	108 E BERLIN ST	DELEON SPRINGS	32130
ONLNFLWMRS0	12080 S WILLIAMS ST	DUNNELLON	34430
ORBHFLMAD50	780 S DEERFIELD AV	DEERFIELD BEACH	33441
OYBHFLFNR80	1881 MASON AV	DAYTONA BEACH	32117
OYBHFLMAD50	288 N RIDGEWOOD AV	DAYTONA BEACH	32114
OYBHFLMAD50	22 S RIDGEWOOD AV	DAYTONA BEACH	32174
OYBHFLMAD50	22 S RIDGEWOOD AV	DAYTONA BEACH	32174
OYBHFLORS0	1778 OCEAN SHORE BLVD	DAYTONA BEACH	32118
OYBHFLPOD80	828 ORANGE AV	DAYTONA BEACH	32118
EGLLFLBG080	1750 CROTON RD	MELBOURNE	32934
EGLLFLHDS0	880 PINE TREE DR	INDIAN HARBOUR BEACH	33457
EORNFLMARS0	18844 E COLONIAL DR	ORLANDO	32838
FLBHFLMARS0	210 S DAYTONA AV	FLAGLER BEACH	32138
FRBHFLFPD50	2100 S 6TH ST	FERNANDINA BEACH	32534
FTGRFLMARS0	8451 HECKSCHER DR	FORT GEORGE	32228
FTLDFLAPRC0	401 SW 40TH ST	FT LAUDERDALE	33318
FTLDFLCR58E	2630 E OAKLAND PARK BLVD	FT LAUDERDALE	33308

ADDRESS

FTLDPLCYD80	8366 NE 14TH AV	FORT LAUDERDALE	33334
FTLDPLJAD80	10141 W BROWARD BLVD	PLANTATION	33334
FTLDPLMRD80	211 NE 2ND ST	FORT LAUDERDALE	33301
FTLDPLDSD0	4200 W OAKLAND PARK BLVD	LAUDERDALE LAKES	33313
FTLDPLPLD80	4036 BRYAN BLVD	PLANTATION	33317
FTLDPLSGD80	14000 NW 8TH ST	SUNRISE	33323
FTLDPLSUK21	8750 W OAKLAND PARK BLVD	SUNRISE	33351
FTLDPLSU74E	8750 W OAKLAND PARK BLVD	SUNRISE	33351
FTLDPLWND80	1431 BONAVENTURE BLVD	FORT LAUDERDALE	33320
FTPRFLMACG0	712 CITRUS AV	FT PIERCE	34668
FTPRFLMAR80	712 CITRUS AVENUE	FORT PIERCE	34660
GCSPFLCND80	512 CENTER ST	GREEN COVE SPRINGS	32043
GCVLFLMAR80	6370 CLIFF ST	GRACEVILLE	32040
GENVFLMAR80	173 1ST ST	GENEVA	32732
GLBRFLMCD80	98 MCCLURE DR	GULF BREEZE	32561
GSVLFLMAD80	400 SW 2ND AV	GAINESVILLE	32601
GSVLFLMAD81	400 SW 2ND AV	GAINESVILLE	32601
GSVLFLNW33E	7825 NW 6TH PL	GAINESVILLE	32607
HAVNFLMAD80	111 SE 1ST ST	HAVANA	33533
HBSDFLMAD80	11600 SE DIXIE HWY	HOBE SOUND	33444
HUNVFLMAD81	1810 HIGHWAY 87 S	NAVARRE	32560
HLWDFLHA48E	120 NE 12TH AV	HALLANDALE	33008
HLWDFLMAD80	716 N FEDERAL HWY	HOLLYWOOD	33020
HLWDFLPED80	81 NW 88TH AV	PEMBROKE PINES	33064
HLWDFLWHD80	250 S 62ND AV	HOLLYWOOD	33023
HMSTFLAFR80	384 HOMESTEAD AIR FORCE BASE	HOMESTEAD	33038
HMSTFLEAR80	2860 N CANAL DR	HOMESTEAD	33036
HMSTFLHMD80	75 CMIC CT	HOMESTEAD	33030
HMSTFLNAR80	14475 SW 284TH ST	HOMESTEAD	33032
HTISFLMAD80	10980 S OCEAN DR	JENSEN BEACH	33117
HWTHFLMAR80	21 NW 1ST ST	HAWTHORNE	32640
IBLMFLMAR80	62689 OVERSEAS HWY	ISLAMORADA	33536
JAY-FLMAR80	107 NORTH CHERRY ST	JAY	32561
JCBHFLABR80	13626 ATLANTIC BLVD	JACKSONVILLE	32221
JOBHFLMA24E	1824 N 3RD ST	JACKSONVILLE BEACH	32080
JOBHFLSPR80	3370 THALIA RD	JACKSONVILLE	32240
JCVLFLARD80	7553 ATLANTIC BLVD	JACKSONVILLE	32211
JCVLFLBWD80	11317 BEACH BLVD	JACKSONVILLE	32216
JCVLFLCLO80	424 N PEARL ST	JACKSONVILLE	32208
JCVLFLFCD80	6854 FT CAROLINE RD	JACKSONVILLE	32277
JCVLFLIAR80	1550 AIRPORT RD	JACKSONVILLE	32218
JCVLFLJTR80	4500 SALISBURY RD	JACKSONVILLE	32219
JCVLFLLF78E	1441 W EDGEWOOD AV	JACKSONVILLE	32208
JCVLFLNOD80	6602 NORMANDY BLVD	JACKSONVILLE	32208
JCVLFLWOD80	11741 N MAIN ST	JACKSONVILLE	32218
JCVLFLRV38E	1710 TALBOT AV	JACKSONVILLE	32208
JCVLFLSU73E	6234 ST AUGUSTINE RD	JACKSONVILLE	32217
JCVLFLSMD80	2048 HENDRICKS AV	JACKSONVILLE	32207
JCVLFLWCO80	6526 JAMES RD	JACKSONVILLE	32210

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## ADDRESS

JPTFLMA74E	112 SEMINOLE AV	JUPITER	33477
KYHGFLMARS0	70 SW MAGNOLIA AV	KEYSTONE HEIGHTS	32080
KYLRFLLSR50	102500 OVERSEAS HWY	KEY LARGO	33057
KYLRFLMARS0	95000 OVERSEAS HWY	KEY LARGO	33057
KYWFPLMAD30	530 SOUTHARD ST	KEY WEST	33040
LKCYFLMAD50	130 W NASSAU ST	LAKE CITY	32025
LKMRFLABRS0	400 RINEHART RD	LAKE MARY	32744
LKMRFLMAD50	368 INTERNATIONAL PKWY	HEATHROW	32744
LYHNFLOND50	812 OHIO AVE	LYNN HAVEN	32444
MCNPFLMARS0	101 NE 3RD AV	MICANOPY	32867
MOBGFLPMD50	3908 MAIN ST	MIDDLEBURG	32066
MIAMFLAED50	115 ALHAMBRA CIR	CORAL GABLES	33134
MIAMFLAERS0	115 ALHAMBRA CIR	CORAL GABLES	33134
MIAMFLAGRS0	1221 BRICKELL AV	MIAMI	33131
MIAMFLAL63E	2470 NW 38TH ST	MIAMI	33142
MIAMFLAPO50	5275 NW 38TH ST	MIAMI SPRINGS	33166
MIAMFLBA85E	2010 SW 17TH AV	MIAMI	33145
MIAMFLBCD50	251 NW 29TH ST	MIAMI	33127
MIAMFLBRD50	1580 LENOX AV	MIAMI BEACH	33139
MIAMFLCAD50	2301 SW 100TH AV	MIAMI	33166
MIAMFLCCK21	444 NW 78TH AV	MIAMI	33156
MIAMFLDBR51	8405 OLD DIXIE HWY	MIAMI	33138
MIAMFLFLD50	2105 W FLAGLER ST	MIAMI	33128
MIAMFLGRD50	45 NW 5TH ST	MIAMI	33128
MIAMFLGRD51	45 NW 5TH ST	MIAMI	33128
MIAMFLHLD50	1245 W 68TH ST	MIAMI	33114
MIAMFLIC88E	8800 HARDING AV	MIAMI BEACH	33141
MIAMFLKED50	89 WESTWOOD DR	KEY BISCAYNE	33140
MIAMFLMERS0	1350 NW 21ST ST	MIAMI	33142
MIAMFLME32E	1350 NW 21ST ST	MIAMI	33142
MIAMFLNMD50	1350 NE 127TH ST	NORTH MIAMI	33161
MIAMFLNSD50	2815 NW 79TH ST	MIAMI	33147
MIAMFLOL68E	2880 NW 137TH ST	MIAMI	33084
MIAMFLPBB8E	25 NAHKODA DR	OPA LOCKA	33084
MIAMFLPLD50	6058 NW 41ST ST	MIAMI SPRINGS	33166
MIAMFLPLR50	6058 NW 41ST ST	MIAMI	33178
MIAMFLRAD50	6100 SW 57TH AV	MIAMI	33178
MIAMFLSH75E	8451 NE 18T AV	MIAMI	33148
MIAMFLSO59E	10701 SW 88TH ST	MIAMI	33138
MIAMFLWDD50	15000 SW 88TH ST	MIAMI	33166
MIAMFLWM26E	1155 SW 67TH AV	WEST MIAMI	33144
MICCFLEBR50	720 W EGRET CIR	WEST MIAMI	33178
MILBRFLMAD50	728 PALMETTO AV	BARFOOT BAY	33070
MILTNFLRAD50	307 RAVINE ST	MELBOURNE	32070
MINDRFLAVD50	8923 WESTERN WAY	MILTON	32550
MINDRFLLOD50	11489 ST AUGUSTINE RD	JACKSONVILLE	32218
MINDRFLLYR50	577 STATE ROAD 13 N	JACKSONVILLE	32218
MINSNFLMARS0	11688 MUNSON HWY	JACKSONVILLE	32218
MIRTHFLVER50	51 COCO PLUM DR	MILTON	32551
		MARATHON	32550

01/19/99 16:18

ADDRESS

MXVFLMAR50	8488 MAXVILLE BLVD	JACKSONVILLE	32234
NOADFLAC84E	2100 NE 164TH ST	NORTH MIAMI BEACH	33162
NOADFLBRD50	18560 NW 27TH AV	MIAMI	33060
NOADFLGGD50	18400 NE 5TH AV	MIAMI	33178
NOADFLLO83E	18281 NE 28TH AV	MIAMI	33180
NKLRFLMAR50	7006 AHN STATE ROAD 905	NORTH KEY LARGO	33037
NBHFFLMA42E	100 CANAL ST	NEW SMYRNA BEACH	32188
NWBYFLMAR50	410 NW 1ST AV	NEWBERRY	32760
OKHLFLMAR50	153 BELL AV	OAK HILL	32830
OLTWFLNRS0	11 AHN MCQUEEN AV	OLD TOWN	32803
ORLDFLAPD50	7320 LAKE UNDERHILL RD	ORLANDO	32803
ORLDFLCLD50	2318 E CENTRAL BLVD	ORLANDO	32803
ORLDFLCLD51	2316 E CENTRAL BLVD	ORLANDO	32801
ORLDFLMAD51	48 N MAGNOLIA AV	ORLANDO	32801
ORLDFLMA42E	48 N MAGNOLIA AV	ORLANDO	32808
ORLDFLPCD50	6821 S ORANGE AV	ORLANDO	32808
ORLDFLPHD50	5120 SILVER STAR RD	ORLANDO	32819
ORLDFLSAD50	4959 W SAND LAKE RD	ORLANDO	32819
ORPKFLMA28E	150 MCINTOSH AV	ORANGE PARK	32073
ORPKFLRWD50	721 BLANDING BLVD	ORANGE PARK	32068
OVIDFLCAD50	84 S CENTRAL AV	ORANGE PARK	32768
PACEFLPVR50	4381 HIGHWAY 90	OVIDO	32761
PAHKFLMAR50	826 E MAIN ST	PAGE	32478
PCBHFLNTD50	904 NAUTILUS ST	PAHOKEE	32413
PLCSFLMAD50	5 CLUB HOUSE DR	PANAMA CITY BEACH	32037
PLTKFLMAD50	318 MAIN ST	PALM COAST	32177
PMBHFLCSD50	9420 ROYAL PALM BLVD	PALATKA	33085
PMBHFLFECG0	1230 N FEDERAL HWY	CORAL SPRINGS	33062
PMBHFLMAD50	1180 BANKS RD	POMPANO BEACH	33060
PMBHFLNPR50	1891 N POWERLINE RD	COCONUT CREEK	33060
PMBHFLTA050	7800 N UNIVERSITY DR	POMPANO BEACH	33062
PMFKFLMAR50	212 WORCHESTER RD	TAMARAC	33061
PNCYFLCAR50	8808 HIGHWAY 22	POMONA PARK	32704
PNCYFLMAD50	111 E 5TH ST	PANAMA CITY	32401
PNSCFLBL43E	30 W BELMONT ST	PANAMA CITY	32401
PNSCFLFPD50	1725 E OLIVE RD	PENSACOLA	32504
PNSCFLHCR50	6915 PINE FOREST RD	PENSACOLA	32508
PNSCFLPBD50	5575 LARMER AV	PENSACOLA	32507
PNSCFLWAD50	515 S OLD CARRY FIELD RD	PENSACOLA	32507
PNVDFLMAD50	637 A1A NORTH	PONTE VEDRA BEACH	32082
PRNFFLMAD50	18648 S DIXIE HWY	MIAMI	33187
PRBNFLFDR50	114 N FOUNTAIN DR	PIERSON	33060
PTSLFLMAD50	450 SW IRVING ST	FORT SAINT LUCIE	34903
PTSLFLSOCG0	2002 SE FORT ST LUCIE BLVD	FORT SAINT LUCIE	34903
SBSTFLPER50	7 S BAY ST	FELLSMERE	32848
SBSTFLMAD50	1137 U S HIGHWAY 1	SEBASTIAN	32958
SGKYFLMAR50	3175 AHN OVERSEAS HWY	SUGARLOAF KEY	33048
SNFRFLMAD50	501 W 9TH ST	SANFORD	32771
SNFRFLMAD51	501 W 9TH ST	SANFORD	32771

## ADDRESS

BTAGFLBRS0	10 OWENS AV	SAINTE AUGUSTINE	32084
BTAGFLMAD00	68 CORDOVA ST	SAINTE AUGUSTINE	32084
BTAGFLSHRS0	4460 U S 1	SAINTE AUGUSTINE	32088
BTAGFLWGR00	4878 STATE ROAD 18	SAINTE AUGUSTINE	32088
STRYFLMAD00	300 W 3RD ST	STUART	32484
BYHSPLCCRS0	617 COUNTRY CLUB DR	LYNN HAVEN	32444
TRENFLMARS0	213 NW FIRST ST	TRENTON	32699
TYVLFLMAD00	820 S HOPKINS AV	TITUSVILLE	32780
VERNFLMARS0	106 COURT ST	VERNON	32482
VRBHFLBERS0	780 BEACHLAND BLVD	VERO BEACH	32903
VRBHFLMAD00	1978 16TH AV	VERO BEACH	32900
WELKFLMARS0	721 3RD AV	WELAKA	32189
WPSHFLANR00	328 GARDENIA ST	WEST PALM BEACH	33401
WPSHFLANR00	328 GARDENIA ST	WEST PALM BEACH	33401
WPSHFLANR00	328 GARDENIA ST	WEST PALM BEACH	33401
WPSHFLGAD00	3800 S MILITARY TR	LAKE WORTH	33453
WPSHFLGAD00	3700 R-C-A BLVD	PALM BEACH GARDENS	33410
WPSHFLHHD00	1880 N HAVERHILL RD	WEST PALM BEACH	33417
WPSHFLHHD00	1800 N HAVERHILL RD	WEST PALM BEACH	33417
WPSHFLHRS0	120 N K ST	LAKE WORTH	33460
WPSHFLLES0E	120 N K ST	LAKE WORTH	33460
WPSHFLR004E	3840 AVENUE E	RIVIERA BEACH	33404
WPSHFLR0050	11488 SOUTHERN BLVD	ROYAL PALM BEACH	33409
WPSHFLR0050	11488 SOUTHERN BLVD	ROYAL PALM BEACH	33409
WWSHFLHHD00	9401 CORTEZ BLVD	BROOKSVILLE	32806
WWSHFLHHD00	1395 DELTONA BLVD	SPRING HILL	32058
YNFNFLMARS0	12102 AZALEA ST	FOUNTAIN	32430
YNTWFLMARS0	4 AMN W HWY 40	YANKEETOWN	34480
YULEFLMARS0	1839 AMN N HIGHWAY 17	YULEE	32087



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0210 Sender's Copy  
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From (please print and press hard)  
Date 9/22/98 Order # 1887-3984-5  
Sender Name Kevin Davis Phone # 205.321-4947

Company BELLSOUTH INTERCONNECTION SVCS  
Address 600 N 19TH ST 9TH FLR  
City BIRMINGHAM State AL Zip 35203  
Fax 938

To (please print and press hard)  
Receiver Name Mr. Olukeyde Ramos Phone # 305 476-4220  
Receiver Address Supra Tekcom  
2620 SW. 27<sup>th</sup> Avenue  
City Miami State FL Zip 33133

Special Services:  
 Insured  
 Signature Required  
 Restricted Access  
 Fragile  
 High Value  
 Hazardous  
 Live Animals  
 Perishable  
 Temperature Sensitive  
 Other

Expenses Package Services:  Package under 25 lbs.  
 FedEx Priority Overnight  FedEx Standard Overnight  
 FedEx First Overnight  
 FedEx 2Day  FedEx Express Saver

Expenses Freight Services:  FedEx Freight  FedEx Express Saver Freight  
 FedEx Freight Economy  FedEx Freight International

Packaging:  FedEx  Other

Special Handling:  Fragile  High Value  Hazardous  Live Animals  Perishable  Temperature Sensitive  Other

Payment:  Cash  Check  Money Order  Bill of Lading  Other

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Dimensions 1 x 1 x 1

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EXHIBIT 2

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01/13/99 16:16

NO. 796 P002/010

**BELLSOUTH**

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

205 321-4900  
Fax 205 321-4334  
Pager 1 800 946-4648 PIN 2294051  
Internet  
Marcus.B.Cathy@bridge.bcs.bs.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 27<sup>th</sup> 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

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/soeredit/soer\\_doc.htm](http://www.interconnection.bellsouth.com/soeredit/soer_doc.htm) (the username and password are both "soeredits.") 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

Changes since last release in Boldface

ERROR CODE	SEVERITY LEVEL	ERROR MESSAGE TEXT
1001	R	CCOA MUST BE 3 ALPHAS
1005	R	CCOA REQUIRED WHEN REQ TYP = A OR B EXCEPT ON ACT TYPE SS, RS, W
1007	R	DUPLICATE CC, FOW, VER
1010	R	FOW REQUIRED
1012	R	CANNOT SUPP A PREVIOUSLY CANCELED LSR/FOW
1015	R	FOW DUPLICATE ON INITIAL LSR
1017	R	FOW 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 - (R) 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/Z 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	DDO/DDO-CC REQUIRED
1070	R	DDO/DDO-CC MUST BE CURRENT OR FUTURE DATE
1080	R	DDO/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	DDOT 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
1110	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 NTR REQUIRED  
 1170 R CC REQUIRED  
 1172 R CC MUST BE 4 ALPHANUMERIC  
 1175 R ABRG 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 = F  
 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 R/N OR 7 A/W  
 1255 R MC MUST BE 4 ALPHANUMERIC CHARACTERS  
 1260 R MCI REQUIRED WHEN MC FIELD IS POPULATED  
 1265 R MCI MUST BE A MINIMUM OF 5 ALPHANUMERIC CHARACTERS  
 1270 R SECNCI MUST BE A MINIMUM OF 5 ALPHANUMERIC CHARACTERS  
 1272 R REQON 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 LSPAUTEDNR 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 CUST REQUIRED WHEN CCMA = CUB  
 1315 R B11 REQUIRED WHEN MORE THAN ONE EBN FIELD IS POPULATED  
 1320 R B11 MUST BE VALID ENTRY OF A, D, L, M, P, R, U, V, W, Z  
 1325 R BNF1 REQUIRED

Reprinted for electronic transmission

Phone: (305) 443-3710  
Fax: (305) 443-1078  
2420 SW 27<sup>th</sup> Avenue  
Miami, FL 33135  
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  
9<sup>th</sup> Floor, 600 North 18<sup>th</sup> Street  
Birmingham, Alabama 35203

**SUPRA'S CRY FOR COMPLIANCE TO THE RULE OF LAW BY BELL SOUTH**

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 - 88 - 1001 - POF - 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 19<sup>th</sup> 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 S. 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". 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

---

<sup>1</sup> 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.<sup>2</sup>

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.<sup>3</sup>

Consequently, the request for FLATS 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

<sup>1</sup> Code of Federal regulations, Telecommunication, 47, Parts 40 to 69, Revised as of October 1, 1997, page 19.

<sup>2</sup> Code of Federal regulations, Telecommunication, 47, Parts 40 to 69, Revised as of October 1, 1997, page 26.

contains intellectual property.<sup>5</sup> 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 Supra<sup>6</sup>.

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 function<sup>7</sup>."

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:

<sup>5</sup> BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, page 8.  
<sup>6</sup> FPSC Order No. PSC - 98 - 1001 - FPP - TP, Docket No: 980119 - TP dated July 27, 1998, Page 47. VII (2).  
<sup>7</sup> 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.<sup>7</sup>

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".<sup>8</sup>

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 validated<sup>9</sup>.

In BellSouth's motion for reconsideration, Ms. White noted that "the LENS update to add this feature will be in place by February, 1999"<sup>10</sup>. 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 Supra<sup>11</sup>.

<sup>7</sup> FPSC Order No. PSC - 98 - 1001 - FPF - TP, Docket No. 980119 - TP dated July 23, 1998, Page 47, VII

(5).

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

<sup>9</sup> FPSC Order No. PSC - 98 - 1001 - FOF - TP, Docket No. 980119 - TP dated July 22, 1998, Page 47, VII

(3).

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

<sup>11</sup> FPSC Order No. PSC - 98 - 1001 - FOF - TP, Docket No. 980119 - TP dated July 23, 1998, Page 48, VII

(8).



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 filed and that is why there are some disputes as to the genuineness 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:

The Commission erred in deciding an issue that was not part of this docket and which neither BellSouth nor Supra addressed.<sup>13</sup>

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.<sup>13</sup>

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

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<sup>13</sup> BellSouth's Motion for Reconsideration and Clarification, dated August 6, 1998, page 5.

<sup>14</sup> Telecommunications Act of 1996, Section 257.

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, Asst. 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 O'Heseler, Director, The Florida Public Service Commission  
Ms. Sally Simmons, The Florida Public Service Commission  
Mr. Wayne Stavanja, The Florida Public Service Commission



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Pager 800 797-5123  
Internet  
Marcus.B.Cooney@bridge.bellsouth.com

Marcus B. Cooney  
Sales Assistant Vice President  
CLIC 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:

#### FLATS

Attachment B, "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 FLATS. It should be noted that Supra

EXHIBIT 5

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

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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