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April 16, 2001

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


Re: 960786-TL (Section 271)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Leave to File Proposed Issues List One Day Out of Time and BellSouth's Proposed Issues 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 by Facsimile and Federal Express as shown on the attached Certificate of Service.

Sincerely,


Nancy B. White (KA)

Enclosures

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

DOCUMENT NUMBER-DATE

04664 APR 16 2001

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
Facsimile, E-Mail and Federal Express this 16th day of April, 2001 to the following:

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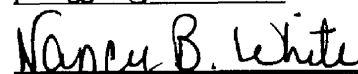
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Nancy B. White (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s entry into) Docket No. 960786-TL
interLATA services pursuant to Section)
271 of the Federal Telecommunications)
Act of 1996.)
_____) Filed: April 16, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC'S
MOTION FOR LEAVE TO FILE PROPOSED ISSUES LIST ONE DAY OUT OF TIME**

NOW COMES, BellSouth Telecommunications, Inc., ("BellSouth"), pursuant to Rule 28-106.204 of the Florida Administrative Code, files its Motion for Leave to File Proposed Issues List one day out of time, and in support hereof states:

1. On March 30, 2001, the Florida Public Service Commission ("Commission") issued its notice of Issues Identification Conference on April 24, 2001.
2. In the Notice, the parties were directed to file their proposed list of issues by Friday, April 13, 2001.
3. Due to an oversight by undersigned counsel, BellSouth did not file its proposed issues on Friday, April 13, 2001. BellSouth hereby requests permission to file its proposed issues list one day out of time.
4. BellSouth has sent a copy of its issues list to all parties of record by e-mail and by Federal Express on this date. BellSouth does not believe any party will be prejudiced if this motion is granted. Undersigned counsel apologizes to the Commission, the Staff and the parties of record for this error. BellSouth e-mailed

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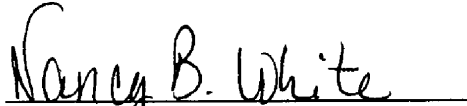
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this motion to all parties of record asking whether they had an objection to the motion. As of the time of filing, BellSouth had responses from MCI, Rhythms and ITC, indicating no objection.

WHEREFORE, BellSouth respectfully requests that its Motion to File Proposed Issues List One Day Out of Time be granted.

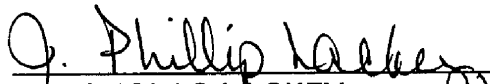
Respectfully submitted this 16th day of April 2001.

BELLSOUTH TELECOMMUNICATIONS, INC



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s entry into) Docket No. 960786-TL
interLATA services pursuant to Section)
271 of the Federal Telecommunications)
Act of 1996.)
_____) Filed: April 16, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC'S
PROPOSED ISSUES**

1. Has BellSouth met the requirements of section 271(c)(1)(A) of the Telecommunications Act of 1996?
 - (a) Has BellSouth entered into one or more binding agreements approved under Section 252 with unaffiliated competing providers of telephone exchange service?
 - (b) Is BellSouth providing access and interconnection to its network facilities for the network facilities of such competing providers?
 - (c) Are such competing providers providing telephone exchange service to residential and business customers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities?

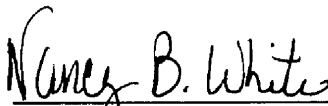
2. Has BellSouth provided interconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(i) and applicable rules promulgated by the FCC?
 - (a) Has BellSouth implemented physical collocation requests in Florida?
 - (b) Does BellSouth have legally binding provisioning intervals for physical collocation?
 - (c) Does BellSouth provide local tandem interconnection to ALECs?

- (d) Does BellSouth permit the use of a Percent Local Usage (PLU) factor in conjunction with trunking?
 - (e) Does BellSouth provide ALECs with meet point billing data?
3. Has BellSouth provided nondiscriminatory access to network elements, with the exception of OSS which will be handled in the third party OSS test, in accordance with the requirements of sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC?
- (a) Does BellSouth provide ALECs with mechanically generated bills in the national standard CABS format?
 - (b) Does BellSouth make usage data for billing purposes available to ALECs?
4. Has BellSouth provided nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of section 224 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(iii) and applicable rules promulgated by the FCC?
5. Has BellSouth unbundled the local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to section 271(c)(2)(B)(iv) and applicable rules promulgated by the FCC?
6. Has BellSouth unbundled the local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to section 271(c)(2)(B)(v) and applicable rules promulgated by the FCC?
- (a) Does BellSouth bill for usage sensitive UNEs?
7. Has BellSouth provided unbundled local switching from transport, local loop transmission, or other services, pursuant to 271(c)(2)(B)(vi) and applicable rules promulgated by the FCC?
- (a) Does BellSouth bill for unbundled local switching on a usage-sensitive basis?
 - (b) Does BellSouth provide unbundled local switching on both the line-side and the trunk-side of the switch?

8. Has BellSouth provided nondiscriminatory access to the following, pursuant to section 271(c)(2)(B)(vii) and applicable rules promulgated by the FCC:
 - (a) 911 and E911 services;
 - (b) directory assistance services to allow the other telecommunications carrier's customers to obtain telephone numbers; and
 - (c) operator call completion services?
 - (a) Does BellSouth provide ALECs access to all information contained in BellSouth's listing database?
 - (b) Does BellSouth provide selective routing in Florida?
9. Has BellSouth provided white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to section 271(c)(2)(B)(viii) and applicable rules promulgated by the FCC?
10. Has BellSouth provided nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to section 271(c)(2)(B)(ix) and applicable rules promulgated by the FCC?
11. Has BellSouth provided nondiscriminatory access to databases and associated signaling necessary for call routing and completion, pursuant to section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC?
12. Has BellSouth provided number portability, pursuant to section 271(c)(2)(B)(xi) and applicable rules promulgated by the FCC?
13. Has BellSouth provided nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3) of the Telecommunications Act of 1996, pursuant to section 271(c)(2)(B)(xii) and applicable rules promulgated by the FCC?
14. Has BellSouth provided reciprocal compensation arrangements in accordance with the requirements of section 252(d)(2) of the Telecommunications Act of 1996, pursuant to section 271(c)(1)(B)(xiii) and applicable rules promulgated by the FCC?

15. Has BellSouth provided telecommunications services available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996, pursuant to section 271(c)(2)(B)(xiv) and applicable rules promulgated by the FCC?
 - (a) Does BellSouth render accurate bills for resold services at the appropriate discount rates?
16. By what date does BellSouth propose to provide intraLATA toll dialing parity throughout Florida pursuant to section 271(e)(2)(A) of the Telecommunications Act of 1996.
17. If the answer to issues 2-15 is "yes", have those requirements been met in a single agreement or through a combination of agreements?
18. Should this docket be closed?

BELLSOUTH TELECOMMUNICATIONS, INC



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