

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION FOR ARBITRATION  
OF IDS TELCOM, LLC, PURSUANT TO  
SECTION 252(b) OF THE  
COMMUNICATIONS ACT OF 1934

Docket No.: 010027-TP

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RECORDS AND  
REPORTING

IDS TELCOM'S PROPOSED LIST OF ISSUES

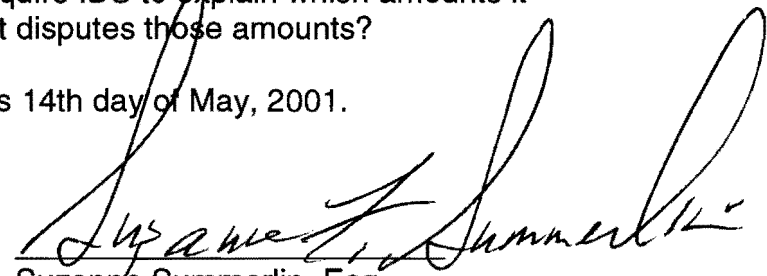
**Issue 1:** When IDS advertises or telemarkets its services, should IDS be allowed to use BellSouth's name as a "selling point?"

**Issue 2:** Should BellSouth be required to combine network elements that are not already combined at the particular location at which the network elements are requested by IDS when the 8th Circuit Court of Appeals has held that "it is not the duty of the ILECs to perform the functions necessary to combine unbundled network elements in any manner as required by the FCC's rules?"

**Issue 3:** When IDS is involved in a line splitting arrangement, should it pay BellSouth the sum of the recurring rates for an unbundled loop and an unbundled port plus the non-recurring charges associated with any work BellSouth must perform to accommodate the line splitting arrangement, or should it be allowed to pay UNE-P rates for an arrangement that is not a UNE-P?

**Issue 4:** If IDS disputes amounts that appear on a bill rendered by BellSouth, is it fair and reasonable to require IDS to explain which amounts it disputes and to document the reasons it disputes those amounts?

Respectfully submitted this 14th day of May, 2001.



Suzanne Summerlin, Esq.  
1311 B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301  
Fla. Bar. No. 398586  
(850) 656-2288

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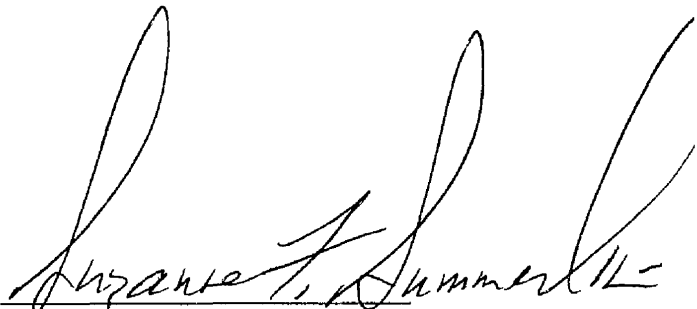
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished this 14th day of May, 2001, by regular Facsimile and U.S. mail to:

Patricia A. Christensen  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6220  
Fax No. (850) 413-6250

BellSouth Telecommunications, Inc.  
Ms. Nancy B. White and James Meza III  
150 West Flagler St., Suite 1910  
Miami, Florida 33130



Suzanne F. Summerlin, Esq.