

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for arbitration concerning complaint of IDS Telecom, LLC against BellSouth Telecommunications, Inc. regarding breach of interconnection agreement.

DOCKET NO. 010740-TP

FILED: June 29, 2001

STAFF'S PRELIMINARY ISSUES

Staff proposes the following issues for the Commission's consideration in Docket No. 010740-TP:

- ISSUE 1: Has BellSouth breached its interconnection agreement with IDS by failing to provide IDS OSS and UNEs at parity?
- ISSUE 2: Has IDS breached its interconnection agreement with BellSouth?
- ISSUE 3: Is BellSouth's "win back" program as used to influence IDS customers anti-competitive?
- ISSUE 4: Is BellSouth's Full Circle Program anti-competitive?
- ISSUE 5: Is the sharing of IDS's customer proprietary network information by BellSouth between its retail and wholesale divisions, in violation of the Telecommunications Act of 1996?
- ISSUE 6: What penalty, if any, is appropriate against BellSouth or IDS if found to be engaging in anti-competitive behavior?

Respectfully Submitted,

MARY ANNE HELTON
Staff Counsel
FLORIDA PUBLIC SERVICE Commission
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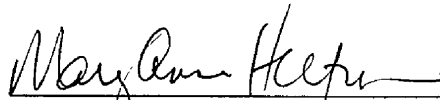
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Staff's Preliminary Issues was furnished to **James Meza III, Esquire** and **Nancy B. White, Esquire**, BellSouth Telecommunications, Inc., 150 West Flagler St., Suite 1910, Miami, Florida 33130, and **Suzanne F. Summerlin, Esquire**, 1311-B Paul Russell Road, Suite 201, Tallahassee, Florida 32301, by U.S. Mail, on this 29th day of June, 2001.



MARY ANNE HELTON, Staff Counsel

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