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July 2, 2001

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Ms. Blanca S. Bayo, Director
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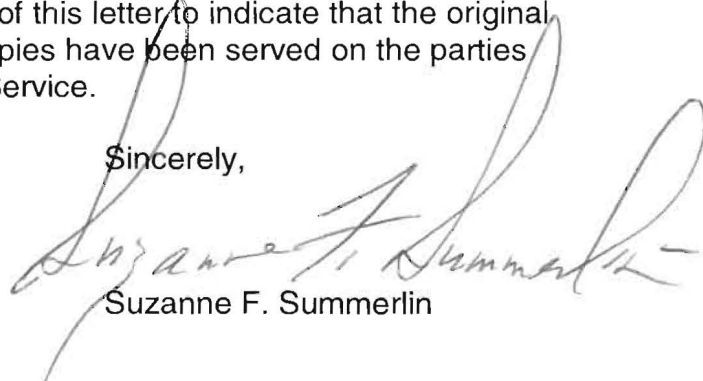
RE: Docket No. 010740-TP (Complaint of IDS Against BellSouth)

Dear Ms. Bayo:

Enclosed please find an original and fifteen copies of IDS Telcom, LLC's Proposed Issues for filing in the above-referenced docket.

Please stamp the enclosed copy of this letter to indicate that the original was filed and return the copy to me. Copies have been served on the parties reflected on the attached Certificate of Service.

Sincerely,



Suzanne F. Summerlin

SFS/sf
cc: Parties of Record
Mr. Keith Kramer

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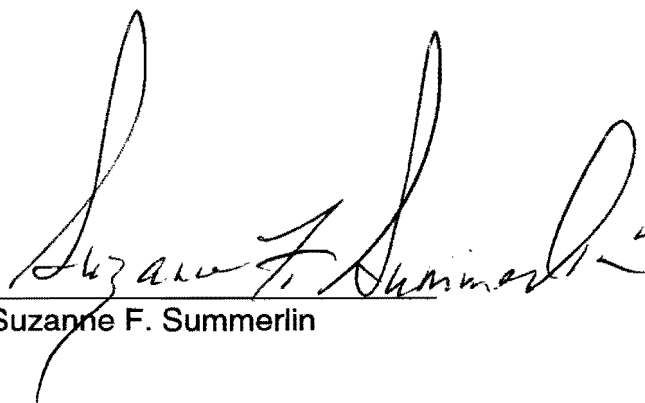
I HEREBY CERTIFY that a true and correct copy of the foregoing
IDS Telcom, LLC's Proposed Issues was furnished by Facsimile (*) and U.S. Mail
this 2nd day of July, 2001, to:

Mary Anne Helton (*)
Staff Counsel
Florida Public Service Commission
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Suzanne F. Summerlin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc.)
n/k/a IDS Telcom, L.L.C., Against)
BellSouth Telecommunications, Inc., and)
Request for Emergency Relief.)
_____)
Docket No. 010740-TP
Filed July 2, 2001

IDS TELCOM, L.L.C.'S PROPOSED ISSUES

IDS Long Distance, Inc. n/k/a IDS Telcom, L.L.C., ("IDS"), submits the following proposed issues for this proceeding to be addressed at the Issue Identification Conference set for Tuesday, July 3, 2001:

1. Has BellSouth breached the Interconnection Agreement with IDS by failing to provide IDS Operational Support Systems ("OSS") at parity with the OSS it provides its own customers?
 - 1(a). Has BellSouth processed IDS' orders for new customers in a manner at parity with BellSouth's processing of its own orders for new customers?
 - 1(b). Has BellSouth processed IDS' orders to change or add services for IDS' customers in a time frame equivalent to the time frame it takes to initiate or change or add services for BellSouth's customers?
 - 1(c). Has BellSouth's LENS System provided IDS accurate data to enable IDS to submit and process orders for new and existing IDS customers?
 - 1(d). Has BellSouth provided IDS adequate notice of changes in its interface systems, including LENS, and changes in policies that affect the processing of IDS' orders for new and existing customers, and changes in prices for services?
 - 1(e). Did BellSouth inappropriately freeze IDS' customers' local service on a resale basis when IDS attempted to move IDS' resale customer base to UNE-P local service in the spring of 2000?

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

- 1(f). Did BellSouth knowingly offer a bulk-ordering system for IDS' use without notification that BellSouth had never market-tested the bulk-ordering system to assure its proper operational functioning?
- 1(g). Did BellSouth's provision of an untested bulk-ordering system to IDS result in the disconnection of service for hundreds of IDS' customers and IDS' eventual loss of hundreds of customers?
- 1(h). Did BellSouth cause the dismantling of IDS' customers' voice mail upon BellSouth's conversion of the customers to IDS' services?
- 1(i). Did BellSouth knowingly permit the dismantling of IDS' customers' voice mail upon BellSouth's conversion of the customers to IDS' services to continue after being notified of the problem by IDS?
- 1(j). What remedial action, if any, did BellSouth take upon notice of BellSouth's dismantling of IDS' customers' voice mail upon the customers' conversion to IDS' services?
- 1(k). Has the record of BellSouth's performance demonstrated that its current operational system utilizing the Local Carrier Service Centers ("LCSCs") to process IDS' orders for IDS' customers is so inherently flawed that it cannot provide IDS parity with the Operational Support Systems BellSouth provides its own customers?
- 1(l). If IDS proves that BellSouth has failed to provide IDS OSS at parity with that provided to BellSouth's own customers, what damages has IDS suffered as a result of such failure?
2. Has BellSouth breached the Interconnection Agreement with IDS by failing to provide IDS Unbundled Network Elements ("UNEs") in the Unbundled Network Element-Platform known as "UNE-Ps" at parity with its provision of these elements to its own customers?
 - 2(a). Did BellSouth refuse to provide UNE-Ps to IDS for an extended period of time in breach of the Interconnection Agreement between the parties?
 - 2(b). Did BellSouth's actions result in IDS having to pay substantially higher rates for resale services when it was lawfully entitled to the lower rates associated with UNE-Ps?
 - 2(c). Has BellSouth provided IDS' customers UNE-Ps in a time frame and at a quality that is at parity with the provision of these elements to BellSouth's own customers?

- 2(d). Has BellSouth unlawfully refused to convert IDS' customers' DSL lines to IDS for resale?
- 2(e). Has BellSouth unlawfully refused to provide hunt grouping between classes of service for IDS' customers?
- 2(f). If IDS proves that BellSouth has failed to provide IDS UNE-Ps at parity with those provided to BellSouth's own customers, what damages has IDS suffered as a result of such failure?
3. Has BellSouth engaged in anticompetitive activities against IDS in violation of Chapter 364, Florida Statutes, and the Telecommunications Act of 1996?
 - 3(a). Has BellSouth telemarketed its services to IDS' customers prior to completing the conversion of those customers to IDS' service?
 - 3(b). Has BellSouth engaged in win back campaigns against IDS which include contacting IDS' customers and describing IDS as at fault for service disruptions, delays, or deletion or omission of features during conversion which are the fault of BellSouth?
 - 3(c). Has BellSouth contacted IDS' customers and offered them discounts of up to 20% for ALEC customers who agree to enter into long term contracts of up to 36 months?
 - 3(d). Has BellSouth telemarketed IDS' customers and attempted to win them back by falsely stating that IDS is going out of business or going into bankruptcy or is otherwise an unreliable provider of local telephone services?
 - 3(e). Has BellSouth won back IDS' customers without obtaining the customers' LOAs or obtaining third-party verification, or otherwise complying with Chapter 364, Florida Statutes, or the rules of the Commission?
 - 3(f). Has BellSouth inappropriately duplicatively billed both IDS and its customers for a minimum of thirty days' service when BellSouth has an IDS customer return to BellSouth's service?
 - 3(g). If IDS proves that BellSouth has engaged in anticompetitive activities, what damages has IDS suffered as a result of such activities? .
4. Has BellSouth inappropriately utilized IDS' CPNI data to attempt to win back customers from IDS prior to completing the conversion of those customers to IDS' services or after such conversion?

- 4(a). Has BellSouth utilized IDS' CPNI data regarding IDS' customers to prevent the conversion of customers to IDS' services?
- 4(b). If IDS proves that BellSouth has inappropriately utilized IDS' CPNI data, what damages has IDS suffered from such utilization of IDS' CPNI data?
5. What remedies should the Commission order BellSouth to provide IDS in the event IDS proves that BellSouth has breached the Interconnection Agreement and/or engaged in anticompetitive activities?
 - 5(a). If IDS proves that BellSouth failed to provision UNE-Ps at parity, should BellSouth be ordered to refund to IDS the difference between the resale rates it was forced to pay BellSouth during the time period that BellSouth refused to provision UNE-Ps ordered by IDS and the UNE-P rates IDS would have paid during that time period?
 - 5(b). If IDS proves that BellSouth has breached the Interconnection Agreement and/or engaged in anticompetitive activities, should BellSouth be ordered to cease and desist all win back activities, including activities pursuant to win back tariffs approved by the Commission, for a period of twelve months following the Commission's determination that BellSouth is providing OSS and UNE-Ps to IDS at parity with that provided to BellSouth's own customers?
 - 5(c). If IDS proves that BellSouth has failed to provide OSS and UNE-Ps at parity with those provided by BellSouth to its own customers, should BellSouth be ordered to refund monies to IDS for its provision of sub-parity OSS and UNE-Ps?
 - 5(d). If IDS proves that BellSouth has inappropriately utilized IDS' CPNI data, what action should the Commission take against BellSouth and what remedy should the Commission order for IDS?
 - 5(d). Should the Commission initiate a show cause proceeding against BellSouth for its violations of Chapter 364, Florida Statutes, and the Commission's rules?

- 5(e). If IDS proves that BellSouth has breached the Interconnection Agreement and/or has engaged in anticompetitive activities, should BellSouth be ordered to partially remedy its wrongdoing towards IDS by sending a notice to all current and former IDS customers with a detailed explanation of the findings of this Commission regarding BellSouth's breach of its Interconnection Agreement and its failure to provide OSS and UNE-Ps at parity with that provided to its own customers?

Respectfully submitted this 2nd day of July, 2001.



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