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August 17, 2001

Ms. Blanca S. Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
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COMMISSION  
CLERK

Re: Docket No. 010795-TP  
Petition by Sprint Communications Company Limited Partnership for  
arbitration with Verizon Florida Inc. pursuant to Section 251/252 of the  
Telecommunications Act of 1996

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s  
Proposed Issues List in the above matter. Service has been made as indicated on the  
Certificate of Service. If there are any questions regarding this information, please  
contact me at (813) 483-2617.

Sincerely,

Kimberly Caswell

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CAF \_\_\_\_\_  
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10127 AUG 17 01

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Sprint Communications ) Docket No.010795-TP  
Company Limited Partnership for arbitration ) Filed: August 17, 2001  
with Verizon Florida Inc. pursuant to Section )  
251/252 of the Telecommunications Act of 1996) )  
\_\_\_\_\_ )

**VERIZON FLORIDA INC.'S PROPOSED ISSUES LIST**

**ISSUE 1:** In the new Sprint/Verizon interconnection agreement:

- (A) For purposes of reciprocal compensation, how should local traffic be defined?
- (B) What language should be included to properly reflect the FCC's recent ISP Remand Order?

**ISSUE 2:** For purposes of the new Sprint/Verizon interconnection agreement:

- (A) Should Sprint be permitted to utilize multi-jurisdictional interconnection trunks?
- (B) Should Sprint be allowed to avoid access charges for calls routed over access facilities to or through its operator services platform that both originate and terminate on Verizon's network?

**ISSUE 3:** For purposes of the new Sprint/Verizon interconnection agreement, should Verizon be required to provide custom calling/vertical features, on a stand alone basis, to Sprint at wholesale discount rates?

**ISSUE 4:** For purposes of the new Sprint/Verizon interconnection agreement, should Verizon be required to combine dark fiber UNEs?

**ISSUE 5:** (A) May the Commission ignore the FCC's analysis and findings in the *UNE Remand Order* that packet switching generally need not be unbundled and independently consider whether Verizon must provide unbundled packet switching notwithstanding the FCC's four conditions?

(B) Does Verizon satisfy the FCC's four conditions?

- (i) Has Verizon deployed digital loop carrier systems or any other system in which fiber optic facilities replace copper facilities in the distribution section?

- (ii) Are there no spare copper loops capable of supporting the xDSL services that Sprint seeks to offer?

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FPSC-COMMISSION CLERK

(iii) Has Verizon refused to permit Sprint to deploy a Digital Subscriber Line Access Multiplexer at the remote terminal, pedestal or environmentally controlled vault or other interconnection point, and has Sprint been unable to obtain a virtual collocation arrangement at these subloop interconnection points as defined by § 51.319(b)?

(iv) Has Verizon deployed packet switching capability for its own use?

(C) If Verizon does not satisfy the FCC's four conditions, should the new Sprint/Verizon interconnection agreement contain language regarding a packet switching obligation that does not currently exist?

ISSUES 6 & 7: For purposes of the new Sprint/Verizon interconnection agreement, should Sprint be permitted to avoid applicable access charges by (1) requiring Verizon to provide UNE Multiplexing so that it may (2) route access traffic over UNEs leased from Verizon at cost-based rates?

ISSUE 8: For purposes of the new Sprint/Verizon interconnection agreement, should Verizon be required to provide Remote Terminal information for loop qualification purposes as requested by Sprint in its proposed language?

ISSUE 9: For purposes of the new Sprint/Verizon, interconnection agreement:

(A) Should the Commission establish interim UNE rates for loop conditioning in this proceeding, to be applied until the Commission establishes final UNE rates in the generic UNE docket?

(B) If so, what should those loop conditioning rates be?

ISSUE 10: For purposes of the new Sprint/Verizon interconnection agreement, should Sprint be required to utilize Verizon's loop qualification database to qualify DSL loops?

ISSUE 11: What proposed language regarding coordinated testing should be incorporated into the new Sprint/Verizon interconnection agreement?

ISSUE 12: Should changes made to Verizon's Commission-approved collocation tariffs, made subsequent to the filing of the new Sprint/Verizon interconnection agreement, supercede the tariffed terms set forth at the filing of this agreement?

ISSUE 13: For purposes of the new Sprint/Verizon interconnection agreement, what interval should be established for the provision of transport facilities for new collocations?

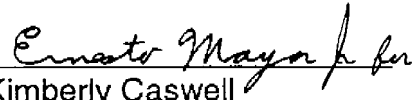
ISSUE 14: What should be the appropriate collocation rates to be included in the new Sprint/Verizon interconnection agreement?

ISSUE 15: For purposes of the new interconnection agreement, should Sprint be required to permit Verizon to collocate equipment in Sprint's central offices?

ISSUE 16: For purposes of the new Sprint/Verizon interconnection agreement, should Verizon be allowed to continue its policy of removing half-ringer network interface devices (NIDS) from DSL-capable loops when a dispatch is required?

ISSUE 17: Should this docket be closed?

Respectfully submitted on August 17, 2001.

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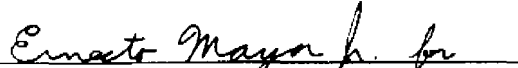
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Proposed Issues List in Docket No. 010795-TP were sent overnight mail(\*) on August 16, 2001 and via facsimile(\*\*) on August 17, 2001 to:

Staff Counsel(\*)  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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