

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Complaint of IDS Long Distance, Inc.
n/k/a IDS Telecom, LLC Against
BellSouth Telecommunications, Inc.,
and Request for Emergency Relief.**

Docket No. 010740-TP

Filed: September 5, 2001

**REPLACEMENT
REBUTTAL TESTIMONY
OF
KEITH KRAMER
ON BEHALF OF
IDS TELCOM, LLC**

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Keith Kramer and my business address is 1525 N.W. 167th
3 Street, Suite 200, Miami, Florida 33169.

4 Q. FOR WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

5 A. I am a Senior Vice President at IDS Telcom, LLC ("IDS").

6 Q. HAVE YOU TESTIFIED IN THESE PROCEEDINGS PREVIOUSLY?

7 A. Yes, I provided direct testimony on July 23, 2001.

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9 A. I will rebut the testimony of several BellSouth employees on issues including
10 BellSouth's anticompetitive actions in connection with its provisioning of
11 UNE-P services to IDS and its anticompetitive winback efforts. In addition,
12 several BellSouth witnesses have presented testimony that appears designed
13 to mislead this Commission, and my testimony will attempt to clarify these
14 issues and present this Commission with an accurate account of BellSouth's
15 actions.

16 **BellSouth's Anticompetitive Behavior**

17 **I. Anticompetitive Actions Regarding Provisioning of Network Combination or**
18 **UNE-P.**

19 **A. BellSouth's Policy and Profit Incentive to Prevent or Delay**
20 **Conversions.**

21 **Q. BELLSOUTH, THROUGH THE TESTIMONY OF JOHN A.**
22 **RUSCILLI, CLAIMS THAT IT HAS NO INCENTIVE TO KEEP**
23 **ALECS PROVIDING END USERS WITH LOCAL TELEPHONE**

1 **SERVICE ON A RESALE BASIS RATHER THAN A UNE-P OR**
2 **NETWORK COMBINATION PLATFORM. IS THERE SOMETHING**
3 **MR. RUSCILLI FAILED TO TELL THE COMMISSION**
4 **REGARDING THE DIFFERENCE BETWEEN RESALE AND UNE-P**
5 **OR NETWORK COMBINATION SALES BY ALECS?**

6 A. Of course, Mr. Ruscilli's statement completely ignores BellSouth's profit
7 motive and the fact that resale is much more profitable to BellSouth than is
8 UNE-P or Network Combinations. To claim that maintaining their high
9 profits is not an incentive for BellSouth is ridiculous.

10 Q. **HOW DO YOU KNOW THAT PROVIDING SERVICE ON A RESALE**
11 **BASIS IS MORE PROFITABLE TO BELLSOUTH THAN**
12 **PROVIDING SERVICE ON A NETWORK COMBINATION OR UNE-**
13 **P BASIS?**

14 A. I know that IDS pays BellSouth considerably less for the same services under
15 a network combination or UNE-P basis than it does on a resale basis. The
16 difference is so great that IDS's gross profit margin at the time it was
17 attempting to convert its entire customer base was approximately negative
18 10% for resale and approximately 34% for network combinations, and after
19 the 319 Remand Order in February 2000, the gross profit margin for UNE-P
20 was approximately 48% in the State of Florida and can be considerably more
21 in other regional BellSouth states. BellSouth has refused to provide IDS with
22 an accounting of its exact profit margins for resale verses network
23 combination or UNE-P. In a statement that exemplifies BellSouth's refusal to

1 present this Commission with honest and straightforward testimony,
2 BellSouth's Assistant Vice President of Sales, Petra Pryor, claims in her
3 deposition that she does not know the profit margins of BellSouth's resale
4 products or UNE products. See Pryor deposition at p. 12, attached as Exhibit
5 KK-13. Based on the charges to IDS alone, it is not difficult to figure out
6 that BellSouth makes substantially more money when ALECs are forced to
7 provide service to end users on a resale basis, rather than through network
8 combinations or UNE-P.

9 Q. **DO YOU KNOW WHETHER BELLSOUTH'S POLICY WAS TO**
10 **HELP ALECS PROCESS CONVERSION OF THEIR ACCOUNTS**
11 **FROM RETAIL OR RESALE TO NETWORK COMBINATIONS OR**
12 **UNE-P?**

13 A. According to the deposition testimony of Gloria Burr it was BellSouth's
14 corporate strategy not to help ALECs to convert their accounts from retail or
15 resale to UNE-P. See Burr deposition p. 99-100, attached as Exhibit KK-14.

16 Q. **BELLSOUTH ATTEMPTS TO REBUT YOUR TESTIMONY THAT**
17 **90% OF MULTI-LINE BUSINESS CUSTOMERS HAVE FEATURES**
18 **THAT CAUSE ORDERS TO DROP OUT OF BELLSOUTH'S**
19 **AUTOMATED SYSTEM AND INTO MANUAL HANDLING, BY**
20 **PROVIDING DATA FOR THE TIME PERIOD MAY-JULY 2001, IS**
21 **THIS THE APPROPRIATE TIME PERIOD FOR SUCH AN**
22 **ANALYSIS?**

1 A: Of course not. This is BellSouth's standard method of operation, they sit on a
2 problem while their competitors' reputations and business bases erode. Only
3 when faced with scrutiny by a Public Service Commission do they fix the
4 problem and then claim that there is nothing left to talk about. But the
5 damage is done and new problems are certain to replace the old ones.

6 **B. Nonfunctional EDI - The Fraudulent Inducement to Enter the**
7 **November 1999 Amendment to the Interconnection Agreement.**

8
9 Q. **THE PANEL REBUTTAL TESTIMONY OF JOHN RUSCILLI,**
10 **ELIZABETH ROKHOLM AND SHELLEY WALLS SUGGESTS**
11 **THAT IDS WAS NOT FRAUDULENTLY INDUCED INTO**
12 **ENTERING THE NOVEMBER 1999 AMENDMENT TO THE**
13 **INTERCONNECTION AGREEMENT, BECAUSE IDS KNEW THAT**
14 **BELLSOUTH'S POSITION WAS THAT PROVIDING NETWORK**
15 **COMBINATION SERVICE FELL OUTSIDE OF THE FLORIDA**
16 **PSC'S JURISDICTION. DOES THIS TESTIMONY ADDRESS THE**
17 **FRAUD THAT INDUCED IDS TO SIGN THE NOVEMBER 1999**
18 **AMENDMENT?**

19 A. Not at all. The fraud was that BellSouth claimed it had two electronic
20 ordering systems, Electronic Data Interface system ("EDI") and TAG,
21 available to submit an ALEC's orders to BellSouth. At the time, and
22 unbeknownst to IDS, EDI was not fully functional and capable of converting
23 retail or resale customers to network combination service. EDI could only
24 support UNE orders and could not support network combination orders, thus
25 these services could not be set up or converted through EDI. See BellSouth

1 EDI information package describing limited application of EDI, attached as
2 Exhibit KK-15. BellSouth was well aware of this fact as Access One and
3 Access Integrated Networks had attempted to utilize EDI to convert network
4 combination orders between February and May 1999, and the EDI system
5 was a complete failure. In response, as discussed below, BellSouth agreed to
6 convert the resale base of these companies to network combination itself.
7 After BellSouth completed the conversion, Access One and Access
8 Integrated Networks abandoned the EDI system and began using TAG to
9 interface with BellSouth.

10 Q. **HOW DID IDS LEARN THAT EDI COULD NOT BE USED TO**
11 **CONVERT SERVICE TO NETWORK COMBINATION?**

12 A. IDS conducted a conversion test with two of its own employees, Freddy
13 O'Quendo and Fabio Gallopi. These employees had local service with
14 BellSouth and IDS attempted to convert them to a Network Combination
15 platform. Both individuals lost all service and were left with no dial tone.
16 Although Pattie Knight claims in her rebuttal testimony that she was unaware
17 of the problem, I assure you that I discussed the problem with her and she
18 initially claimed that the problem was caused by IDS employees who needed
19 additional training. Later Gary Smart conceded that the problem was caused
20 by BellSouth. See Gary Smart letter attached as Exhibit KK-16.

21 Q. **WERE OTHER ALECS USING EDI FOR NETWORK**
22 **COMBINATION CONVERSIONS DURING THE END OF 1999 AND**
23 **THE BEGINNING OF 2000?**

1 A. No. To the best of my knowledge, contrary to the deposition testimony of
2 Jimmy Patrick there were not other ALECs successfully using EDI for
3 network combination conversions in 1999. In fact, the two ALECs that he
4 claims were using EDI for network combination conversions in 1999 (AT&T
5 and ITC/Deltacom), did not even have Network Combinations Agreements
6 with BellSouth at that time. See ITC/Deltacom letter attached as Exhibit KK-
7 17.

8 Q. **HOW DO YOU RESPOND TO BELLSOUTH'S ATTEMPT TO**
9 **REBUT YOUR TESTIMONY THAT EDI WAS NOT SET UP FOR**
10 **PORT-LOOP CONVERSIONS OR NETWORK COMBINATIONS BY**
11 **CLAIMING ON PAGE 16 OF THE PANEL REBUTTAL TESTIMONY**
12 **OF WILSON, KNIGHT, RAND AND PATRICK, THAT "AT LEAST**
13 **THREE ALECS ARE CURRENTLY USING EDI TO CONVERT**
14 **LINES FROM RESALE TO UNE-P?"**

15 A. This testimony ignores the question of when EDI was set up for network
16 combinations, port-loop or UNE-P conversions. I testified on direct that "[i]t
17 was not IDS'[s] fault that the electronic mechanism . . . was not designed at
18 that time to accept UNE port/loop conversion." At the time IDS was
19 attempting to convert its resale base in late 1999 and early 2000, EDI was not
20 set up to handle this function. Whether EDI can process port-loop
21 conversions almost two years later is irrelevant.

1 Q. **DID OTHER ALECS WITH NETWORK COMBINATION**
2 **AGREEMENTS WITH BELL SOUTH EXPERIENCE THE**
3 **PROBLEMS WITH EDI?**

4 A. Yes. To my knowledge, at that time there were only two other ALECs who
5 had Network Combinations Agreements to establish network combination
6 services (Access One and Access Integrated Networks). These carriers also
7 chose to utilize EDI to interface with BellSouth in early 1999. However due
8 to problems of an unknown nature, they also could not convert their lines to
9 network combinations. Although BellSouth ultimately agreed to convert the
10 lines itself, contrary to Ken Ainsworth's testimony, BellSouth did not offer to
11 convert the lines because Access One and Access Integrated Networks were
12 paying market based rates. Rather, it was because BellSouth failed to
13 provide an electronic interface that worked. Although IDS also had entered
14 into an agreement to pay market based rates at that time and was provided
15 with an interface that did not work, for unknown reasons BellSouth treated
16 IDS differently and did not offer to convert IDS's lines.

17 Q. **CAN YOU EXPLAIN THE FINANCIAL IMPACT THAT THE**
18 **INABILITY TO CONVERT CUSTOMERS FROM RETAIL OR**
19 **RESALE TO NETWORK COMBINATIONS AND UNE-P BETWEEN**
20 **NOVEMBER 1999 AND MAY 2000 HAD ON IDS?**

21 A. It was devastating. Based on the false belief that it could convert customers
22 to network combinations with BellSouth's EDI system, in December 1999
23 IDS began entering into agreements to provide local telephone service at a

1 discount of 20% off BellSouth's rates. While this would be profitable for IDS
2 if the customer were on a network combination basis, IDS would lose money
3 if it had to provide service to the customer on a resale basis. On a resale
4 basis, IDS was receiving a 16.9 discount on BellSouth's rates, but had agreed
5 to provide the service to its customers at an even lower price. While IDS's
6 gross profit margin was approximately negative 10% for these customers on a
7 resale basis, its gross profit margin at the time was approximately 35% once
8 it could get these customers on a network combination. As discussed in my
9 direct testimony, the cost of the delay to IDS was \$929,999, not including the
10 customers who left IDS due to the bulk ordering fiasco when BellSouth
11 disconnected the service of so many IDS customers.

12 **Q. ON PAGE 8 OF HER REBUTTAL TESTIMONY, MS. PRYOR IS**
13 **ASKED TO COMMENT "ON MR. KRAMER'S CONTENTION ON**
14 **PAGE 44 OF HIS DIRECT TESTIMONY THAT BELLSOUTH**
15 **AGREED TO PAY IDS \$929,999 PLUS \$1,400,000 TO SETTLE THE**
16 **BULK ORDERING INCIDENT," WOULD YOU COMMENT ON**
17 **THIS QUESTION AND HER RESPONSE.**

18 **A.** It is bad enough when witnesses such as Ms. Pryor provide misleading
19 testimony to this Commission, but in this case, the question itself misstates
20 my testimony.¹ I did not claim that BellSouth "agreed to pay IDS \$929,999
21 plus \$1,400,000 to settle the Bulk Ordering Incident," I said that Ms. Pryor

¹ Likewise, in her direct testimony, Ms. Pryor is asked "[d]id BellSouth ever offer IDS \$2.4 million to settle any of its claims, as alleged by Mr. Kramer?" Pryor direct testimony p. 6 line 15.

1 aided IDS's completion of a Billing Adjustment Request and told IDS to
2 deduct that sum from the current bill that IDS owed BellSouth. Because the
3 Interconnection Agreement with BellSouth required IDS to pay its bills in
4 full, while it was disputing an item, and Ms. Pryor permitted IDS to withhold
5 payment, I did believe that BellSouth had agreed to the disputed amount.
6 However, they later stated that they only would provide IDS with a credit of
7 \$546,000. See January 8, 2001, BellSouth letter from C. Morton to IDS
8 referring to BellSouth's agreement to provide IDS with a \$546,000 credit,
9 attached as Exhibit KK-18. For an unknown reason, in Mr. Morton's
10 testimony, he states that BellSouth's position is now that IDS is not even
11 entitled to the reduced credit.

12 **C. EDI training**

13 **Q. CAN YOU ADDRESS THE TRAINING THAT BELLSOUTH**
14 **PROVIDED TO IDS REPRESENTATIVES IN FEBRUARY OF 2000?**

15 **A.** As Pattie Knight claimed that the problems IDS experienced with EDI were
16 due to insufficient training, I arranged to have BellSouth provide additional
17 training in February 2000. The training was a complete bust, as the IDS
18 representatives complained that the training was simply a rehash of things
19 they knew and even the trainers could not get EDI to work properly.

20 **Q. IDS'S COMPLAINT AND YOUR DIRECT TESTIMONY ADDRESS**
21 **THE SITUATION IN WHICH MS. RAND TRAINED IDS**
22 **EMPLOYEES ON EDI AND IDS ASKED HER TO PROCESS AN**
23 **ORDER TO DEMONSTRATE HOW IT WORKED. CAN YOU**

1 **RESPOND TO MS. RAND'S TESTIMONY THAT "NEITHER MR.**
2 **KRAMER NOR ANYONE ELSE ASKED ME TO PROCESS AN**
3 **ORDER THROUGH EDI."**

4 A. It appears that Ms. Rand is playing games with her wording in an attempt to
5 mislead this Commission. First, I personally asked Ms. Rand to demonstrate
6 how an order should be processed through EDI and second, while she may
7 not have technically processed the order herself, she stood next to Brad
8 Hamilton's computer terminal and walked him through the process, step by
9 step. They couldn't get the order to go through. See the rebuttal testimony of
10 Brad Hamilton for a more detailed description of these events. Ms. Rand's
11 testimony, which doesn't even mention the failed test, is further evidence that
12 BellSouth is not attempting to present this Commission with the whole truth.

13 Q. **ON PAGE 11 AND 13 OF HER REBUTTAL TESTIMONY, MS. RAND**
14 **DENIES THAT SHE RECOMMENDED THAT IDS CONSIDER**
15 **USING TAG BECAUSE EDI WAS NOT FUNCTIONING PROPERLY**
16 **AND WAS NOT SUPPORTING NETWORK COMBINATIONS. DO**
17 **YOU RECALL YOUR CONVERSATION WITH MS. RAND?**

18 A. Yes, immediately after her demonstration of the EDI system had failed we
19 discussed the possibility of IDS using TAG. We discussed TAG as a
20 possible viable alternative to aid IDS's interface with BellSouth because of
21 the problems IDS was experiencing with EDI. IDS ordered TAG in February
22 2000 (rather than January 2000), after IDS had become painfully aware that it

1 had been fraudulently induced to enter an agreement with BellSouth based on
2 false claims that BellSouth had a fully functional EDI system available.

3 **D. Beta Testing The Bulk Ordering System.**

4 **Q: DO YOU KNOW WHETHER BELLSOUTH TESTED THE BULK**
5 **ORDERING FUNCTION PRIOR TO OFFERING IT TO IDS?**

6 A: Yes, although I did not know it at the time, it is my understanding that
7 BellSouth tested the bulk ordering function with Access Integrated Networks
8 in early April 2000. I understand that Access Integrated Networks tested the
9 bulk ordering system for approximately two weeks and that the test was a
10 complete failure. Because of the test's failure, Access Integrated Networks
11 ceased using the bulk ordering system on or about April 17, 2000. On that
12 same date, Ms. Pryor sent IDS a letter addressing a possible beta of the bulk
13 ordering system by IDS.

14 **Q. IN THE REBUTTAL PANEL TESTIMONY OF PETRA PRYOR AND**
15 **MICHAEL LEPKOWSKI, MS. PRYOR SUGGESTS THAT**
16 **BELLSOUTH AND IDS DID NOT DISCUSS IDS BETA TESTING**
17 **THE BULK ORDERING SYSTEM UNTIL AFTER THE BULK**
18 **ORDERING INCIDENT IN MAY 2000 AND CLAIMS THAT HER**
19 **APRIL 17, 2000 LETTER WAS MISDATED. SHE GOES ON TO**
20 **STATE THAT "[A]T NO TIME DID BELLSOUTH AGREE TO BETA**
21 **TEST THE BULK ORDERING FEATURE WITH IDS PRIOR TO**
22 **THE BULK ORDERING INCIDENT." HOW DO YOU RESPOND?**

1 A. It is clear that Ms. Pryor's letter was correctly dated April 17, 2000 as IDS
2 received a follow-up e-mail from Mr. Lepkowski on April 27, 2000
3 addressing issues pertaining to the proposed beta testing. See Lepkowski
4 April 27, 2000 e-mail attached as Exhibit KK-19. Likewise, on the same
5 page of the rebuttal testimony, Mr. Lepkowski admits that "[p]rior to the
6 Bulk Ordering Incident, I received an e-mail from BellSouth employee Terry
7 Hudson asking me if I thought IDS would be interested in participating in a
8 beta test of the bulk ordering feature." See Hudson e-mail attached as Exhibit
9 KK-20. While Ms. Pryor is correct that BellSouth did not reach an
10 agreement with IDS regarding beta testing the bulk ordering system prior to
11 what BellSouth refers to as the Bulk Ordering Incident, Mr. Lepkowski's own
12 testimony, as well as the documented letter from Ms. Pryor and follow-up e-
13 mail, all confirm the fact that IDS and BellSouth discussed the possibility of
14 IDS beta testing the bulk ordering system prior to the Bulk Ordering Incident.
15 Indeed, when BellSouth announced that its bulk ordering system was
16 available to all ALECs, IDS believed that BellSouth had successfully beta
17 tested the system with another ALEC. Only later, and at great expense, did
18 IDS learn that the system had not been successfully beta tested.

19 Q: **DID BELLSOUTH TELL IDS ABOUT THE PROBLEMS**
20 **EXPERIENCED BY ACCESS INTEGRATED REGARDING ACCESS**
21 **INTEGRATED'S BULK ORDERING TEST?**

22 A: No. Although it appears that BellSouth knew that the bulk ordering system
23 failed testing with Access Integrated Networks, BellSouth did not advise

1 IDS. Instead, BellSouth touted the system as fully functional at the
2 BellSouth ALEC forum. In fact, I only learned of the failed Access
3 Integrated Networks bulk ordering test during the course of discovery in this
4 action.

5 Q: **DO YOU KNOW WHETHER THE BULK ORDERING SYSTEM IS**
6 **NOW FULLY FUNCTIONAL?**

7 A: It is my understanding that the bulk ordering system is now fully functional.
8 In fact, I reviewed the deposition transcript of Gloria Burr, an employee at
9 BellSouth in charge of the bulk ordering beta test, and she concluded that
10 "[e]ventually the [beta test results at IDS] were satisfactory." See Burr
11 deposition at p. 54. Notwithstanding the satisfactory test results and the
12 tremendous benefits of the bulk ordering product, BellSouth decided not to
13 release the bulk ordering system, as part of a "corporate strategy." See Burr
14 deposition at pp. 99-100, Exhibit KK-14.

15 **E. The Premature Bulk Ordering Roll-Out and the Resulting Fiasco.**

16 Q. **HOW DID IDS REACT TO BELLSOUTH'S ANNOUNCEMENT AT**
17 **THE ALEC INFORUM ON MAY 2-3, 2000, THAT ITS BULK**
18 **ORDERING SYSTEM WAS AVAILABLE TO ALECs THROUGH**
19 **THE LENS SYSTEM?**

20 A. IDS's Brad Hamilton asked whether BellSouth was sure its bulk ordering
21 system worked and when they confirmed that the system was completely
22 functional, I instructed Mr. Hamilton to sign up for the service immediately.

1 Q. **DID YOU BELIEVE THAT THE BULK ORDERING SYSTEM HAD**
2 **BEEN BETA TESTED WITHOUT IDS?**

3 A. Certainly, I knew that BellSouth could not release a product without adequate
4 testing and assumed they had successfully conducted the beta testing without
5 IDS. Unfortunately, it was not until later that IDS learned no such testing
6 had taken place. BellSouth now claims that the release of the untested
7 product was just a mistake and that the sales representatives involved did not
8 realize the product had not been successfully beta tested. In fact, just two
9 weeks before the BellSouth sales group announced that bulk order
10 conversions were available, the sales group had set up the beta test with
11 Access Integrated Networks that had completely failed. As described in the
12 testimony of IDS employees Mr. Gulas and Ms. Wellman, BellSouth does
13 not release products without approval from several different departments. All
14 of this strongly suggests that BellSouth chose to release its untested bulk
15 ordering system on an unsuspecting group of ALECs.

16 Q. **DO YOU AGREE WITH MR. LEPKOWSKI'S TESTIMONY ON**
17 **PAGE 6 LINE 25 OF THE PANEL REBUTTAL TESTIMONY OF**
18 **PRYOR AND LEPKOWSKI, THAT IDS'S TWENTY FIVE (25) BULK**
19 **ORDERING TEST ORDERS "WOULD NOT TAKE THE PLACE OF**
20 **A BETA TEST BECAUSE IT CERTAINLY DID NOT ADDRESS ALL**
21 **THE POSSIBILITIES THAT A BETA TEST WOULD ADDRESS?"**

22 A. I agree that the test was not intended to take the place of a beta test. At the
23 time of the test, however, IDS had been told that the product had been

1 successfully beta tested, yet still wanted to proceed with a test group before
2 submitting its entire customer base for conversion. IDS began with a
3 conversion of a group of 84 (not 25) customers. BellSouth incorrectly
4 "confirmed" that the conversions had gone through successfully. Based on
5 BellSouth's confirmation that the test orders had successfully gone through,
6 IDS began converting its entire customer base on Monday May 8, 2000. The
7 resulting fiasco was previously addressed in my direct testimony and has not
8 been rebutted by BellSouth. Had IDS known that BellSouth had not properly
9 beta tested the product before unleashing it on an unsuspecting public, it
10 would not have attempted such a large scale conversion.

11 **Q. CAN YOU COMMENT ON KEN AINSWORTH'S TESTIMONY**
12 **THAT ONLY FOUR IDS CUSTOMERS LOST DIAL TONE DURING**
13 **THE FAILED ATTEMPT TO CONVERT IDS'S ENTIRE CUSTOMER**
14 **BASE FROM RESALE TO UNE-P IN EARLY MAY, 2000?**

15 **A.** Again this testimony is quite misleading. Of the initial 1,200 conversion
16 orders, over 400 customers were left in an out of service condition. This
17 means that a customer's service is not working correctly. For example, the
18 bulk ordering disaster left most of IDS's business customers without their
19 hunting feature. This feature is critical to many businesses, as it permits calls
20 to a main business number to "roll over" to other lines in the company.
21 Without this service, a single call to a business can tie up its entire phone
22 service. Although the bulk ordering problems were caused by BellSouth, as I
23 reported to Petra Pryor at the time, these problems led directly to

1 approximately 750 IDS customer lines switching back to BellSouth. My
2 direct testimony incorrectly cited a number of 1,400 customer lines who
3 returned to BellSouth due to bulk ordering problems, however, the correct
4 number is 750, as IDS originally reported to BellSouth.

5 **F. Local Service Freeze.**

6 **Q. BELLSOUTH PRESENTED THREE WITNESSES, INCLUDING**
7 **JANET MILLER-FIELDS, MR. LEPKOWSKI AND MS. PRYOR, TO**
8 **TESTIFY REGARDING THE USE OF A TOOL CALLED A LOCAL**
9 **SERVICE FREEZE, CAN YOU EXPLAIN HOW BELLSOUTH**
10 **UTILIZED LOCAL SERVICE FREEZES IN AN**
11 **ANTICOMPETITIVE FASHION?**

12 **A.** IDS put a Local Service Freeze on IDS customer accounts to ensure that
13 these accounts were not switched to a new carrier without authorization.
14 However, BellSouth used the Local Service Freeze as an anticompetitive tool
15 in two ways: First, BellSouth utilized the Local Service Freeze to impair
16 IDS's ability to convert its own customers from resale to UNE-P, despite the
17 fact this did not involve a carrier change. Second, even though BellSouth
18 permitted IDS to add the Local Service Freeze code to its own customer
19 accounts, for an unknown reason, BellSouth initially refused to permit IDS
20 itself to remove the Local Service Freeze on its customer's accounts.

21 **Q: DO YOU HAVE ANY DOCUMENTS TO SUPPORT YOUR**
22 **PROPOSITION THAT BELLSOUTH INTENTIONALLY USED THE**
23 **LOCAL SERVICE FREEZE IN AN ANTICOMPETITIVE MANNER?**

1 A: Yes. I have an internal BellSouth e-mail from Pat Rand addressed to Landra
2 Martin. This e-mail discusses the problems that Local Service Freeze created
3 for IDS when IDS attempted to move its resale customers to UNE-P. Mr.
4 Rand states that "[t]here appears to be some LESOG programming edits that
5 are inhibiting this CLEC [IDS] from processing resale to UNE-P conversion
6 orders on accounts the CLEC has frozen. Guess we showed them how we
7 could really freeze the account. HA!" See E-mail of Pat Rand, attached as
8 Exhibit KK-21. This e-mail is a real-life example of the attitude IDS
9 encounters by the BellSouth employees who are supposed to help IDS, and
10 provides much more insight than the carefully tailored testimony BellSouth
11 now offers to explain this issue.

12 **G. Problems with ADSL**

13 **Q. BELLSOUTH CLAIMS THAT IT IS NOT REQUIRED TO PROVIDE**
14 **ADSL SERVICE TO CUSTOMERS WHO RECEIVE UNE-P**
15 **SERVICE THROUGH IDS. DID BELLSOUTH IN FACT EVER**
16 **PROVIDE SUCH SERVICE?**

17 A. Although BellSouth now claims that it did not have to, BellSouth converted
18 customers with BellSouth's ADSL service to IDS on a UNE-P basis.
19 BellSouth then began disconnecting the customer's DSL service without
20 warning. BellSouth then told some of these IDS customers they could only
21 have their DSL service restored if they switched their entire local phone
22 service and ADSL back to BellSouth. See letter from Maury Enterprises to

1 the FCC dated 4/30/01 and other customer e-mails addressing this issue
2 attached as Composite Exhibit KK-22.

3 Q. **WHAT ARE IDS'S COMPLAINTS REGARDING HOW BELLSOUTH**
4 **HANDLED IDS'S CUSTOMERS WHO HAVE ADSL?**

5 A. IDS's first complaint is that BellSouth had no authority to disconnect the DSL
6 service that was being provided to IDS customers who had been converted to
7 UNE-P service. These were IDS customers, not BellSouth customers.
8 Second, in no event does the FCC or the Florida Public Service Commission
9 permit BellSouth to turn off an IDS customer's DSL service and then refuse
10 to restore service until the customer returns all of their local phone service
11 back to BellSouth.

12 BellSouth claimed that IDS could remedy the problem by simply
13 switching the customers' ADSL back to resale while leaving their other local
14 phone service on a UNE-P basis. IDS complied by requesting that ADSL
15 service be switched back to resale. Instead, BellSouth apparently changed its
16 mind and without warning left the customers without any DSL service.
17 BellSouth again used this problem to its own benefit by telling IDS
18 customers that they could have their DSL service restored only by returning
19 to BellSouth. See letter from Maury Enterprises to the FCC dated 4/30/01
20 attached as part of Exhibit KK-22.

21 **H. MemoryCall Service**

22 Q. **BELLSOUTH DISCUSSES WORK THAT IT DID TO PREVENT**
23 **MEMORYCALL MAILBOXES FROM BEING DISCONNECTED**

1 **WHEN BEING CONVERTED FROM RETAIL OR RESALE TO UNE-**
2 **P. DO YOU HAVE ANY COMMENTS REGARDING THE WORK**
3 **BELLSOUTH DID TO PREVENT THIS PROBLEM?**

4 A. IDS first identified this problem and notified BellSouth in approximately
5 June of 1999. According to an e-mail from Freddy O'Quendo in June 2000,
6 BellSouth had created a fix in the summer of 1999 during the conversion of
7 Access One and Access Integrated Networks. As presented in witness Harris'
8 testimony, the fix was incorporated in the downstream system but the fix was
9 not installed to the ALECs' ordering system until March 2001, thus providing
10 BellSouth with a tool to disrupt the service IDS provides for over a year.

11 **I. Failure to Promptly Provide ALECs With Updated Information**

12 Q. **ON PAGE 9 OF HIS PANEL REBUTTAL TESTIMONY, MR.**
13 **LEPKOWSKI TESTIFIED REGARDING A DISCUSSION THE TWO**
14 **OF YOU HAD REGARDING INFORMATION PROVIDED TO**
15 **ALECS THROUGH THE LENS SYSTEM AND THROUGH THE**
16 **CSOTS SYSTEM. CAN YOU EXPLAIN WHY THIS DISCUSSION**
17 **UPSET YOU?**

18 A. Sure, I was upset because BellSouth told ALECs to use their LENS system
19 for CSR updates of conversion completions and they did not disclose that
20 CSOTS had more accurate and updated information regarding conversion.
21 Long delays in BellSouth updating its LENS system led to IDS not knowing
22 when conversions were complete and thus to not being able to bill its
23 customers. All the while, unbeknownst to IDS, it could have been receiving

1 updated conversion information from the CSOTS system. BellSouth never
2 provided an explanation of why it did not provide IDS with this information.

3 Q. **BELLSOUTH WITNESS, MR. WILSON, ADDRESSES THE**
4 **ALLEGATION THAT BELLSOUTH WAS NOT UPDATING LENS IN**
5 **A TIMELY FASHION. MR. WILSON SUGGESTS THAT YOU**
6 **(KEITH KRAMER) WERE DESCRIBING DELAYS IN UPDATING**
7 **BELLSOUTH'S CUSTOMER SERVICE RECORDS ("CSR")**
8 **RATHER THAN LENS AND CLAIMS (IN BOTH HIS DIRECT AND**
9 **HIS REBUTTAL TESTIMONY) THAT IN MOST CASES CSR IS**
10 **UPDATED WITHIN 24-48 HOURS OF AN ORDER BEING**
11 **CORRECTLY POSTED TO THE CUSTOMER RECORD**
12 **INFORMATION SYSTEM ("CRIS"). DO YOU AGREE WITH THIS**
13 **TESTIMONY?**

14 A. No. This testimony completely ignores the fact that in November and
15 December of 2000, BellSouth was not updating CRIS in a timely fashion.
16 The delays led to IDS not being aware for weeks that conversions were
17 completed and therefore, IDS could not bill its customers. At the time I
18 spoke with Mr. Lepkowski of BellSouth, who led me to believe the problem
19 was that BellSouth was not completing the conversions in a timely manner
20 and that BellSouth would "back-date" the effective billing date to the date
21 that the conversion should have been completed. Mr. Lepkowski suggested
22 that BellSouth was back dating the EBD as a favor to IDS and that IDS

1 should start billing from the EBD, even if the conversion had not actually
2 been completed.

3 **Q. HOW DID YOU REACT TO MR. LEPKOWSKI'S SUGGESTION**
4 **THAT IDS SHOULD BILL ITS CUSTOMERS BEGINNING ON THE**
5 **EBD, EVEN IF THEIR SERVICE HAD NOT BEEN CONVERTED BY**
6 **THAT DATE?**

7 A. I told him that his proposal was completely unacceptable. Mr. Lepkowski
8 was suggesting that IDS bill end users for services they were still receiving
9 from BellSouth and he acknowledged that BellSouth would be sending a bill
10 for the same services. He was suggesting a solution that was unfair,
11 dishonest, and certain to cause even more problems with IDS customers.

12 **Q. DID YOU LATER LEARN THAT BELLSOUTH WAS NOT BACK**
13 **DATING THE CONVERSION TO THE EFFECTIVE BILLING**
14 **DATE?**

15 A. Yes. According to Mr. Wilson's testimony, the real problem was that the
16 conversions were being completed, but there was a substantial delay in
17 updating the CRIS system to let ALECs such as IDS know. Due to
18 BellSouth's failure to update CRIS in a timely fashion, it appeared that
19 BellSouth was only processing approximately 50% of IDS's orders during
20 this time period. Ultimately, the end result of the delay versus back dating
21 conversion dates was the same, as IDS was unable to begin billing its
22 customers because it did not know that their conversion had been completed.

1 Q. CAN YOU REPLY TO MS. PRYOR'S CLAIM ON PAGE 7 LINE 7 OF
2 HER REBUTTAL TESTIMONY THAT THE QUANTITY OF
3 ORDERS PROCESSED BY IDS HAS NEVER COME CLOSE TO
4 1,000 ORDERS PER DAY?

5 A. Yes, although IDS at times sold over 1,000 lines per day. It only processed
6 as many as 968 lines in a single day. Although IDS was processing a large
7 volume of lines during November and December 2000, due to BellSouth's
8 delays with CRIS updates, it appeared that a much lower volume was being
9 processed.

10 **II. Anticompetitive Winback Activities.**

11 **A. BellSouth's Use of Service Disruptions for Winback.**

12 Q. **MR. RUSCILLI'S TESTIMONY DISCUSSES BELLSOUTH'S**
13 **ALLEGED POLICY NOT TO USE SERVICE DISRUPTIONS AS AN**
14 **OPPORTUNITY FOR WINBACK. IN YOUR EXPERIENCE, IF THIS**
15 **POLICY EXISTS, IS IT FOLLOWED BY BELLSOUTH**
16 **REPRESENTATIVES?**

17 A. No. It is evident from the exhibits attached to IDS's Complaint that
18 customers who experience service disruptions during conversion from
19 BellSouth to IDS regularly contact BellSouth and are told that IDS ordered
20 the disconnection of their service. They are not told that BellSouth is
21 supposed to process the disconnection and new service orders
22 simultaneously. IDS has documented and attached to its Complaint instances
23 in which the customer is told that their service was disconnected at the

1 request of IDS and that the only way to have their service restored promptly
2 is to return their service to BellSouth. There is no excuse of this type of
3 winback behavior.

4 Q. **WILL YOU COMMENT ON MR. RUSCILLI'S COMMENT THAT**
5 **WINBACK DURING A CUSTOMER CALL DUE TO A SERVICE**
6 **OUTAGE IS PERMISSIBLE IF THE CUSTOMER RAISES THE**
7 **TOPIC?**

8 A. These winback discussions are wholly inappropriate. First, the customer is
9 an IDS customer and BellSouth should simply direct them to contact IDS
10 without further comment. Second, IDS has no way to monitor these
11 conversations to determine who initiates winback discussions and should not
12 have to rely on BellSouth representatives, who are compensated based, at
13 least in part, on sales volume and who have repeatedly used improper tactics
14 to mislead IDS's customers.

15 Q. **MR. RUSCILLI'S STATEMENT AT PAGE 28 OF HIS TESTIMONY**
16 **INDICATES WINBACK LETTERS ARE NOT SENT TO A**
17 **CUSTOMER UNTIL AFTER THEIR SERVICE IS DISCONNECTED.**
18 **DOES THIS ADDRESS THE MISUSE OF BELLSOUTH'S ROLE AS**
19 **THE WHOLESALE PROVIDER OF SERVICE TO IDS?**

20 A. This does not address the common situation in which the disconnect is
21 completed, but the new service portion of the order is not completed. In
22 these cases, not only is the IDS customer left without service, but they are
23 being solicited to return to BellSouth "who can restore their service."

1 Q. DO YOU AGREE WITH BELLSOUTH'S ASSERTION THAT ITS
2 WHOLESALE DIVISION DOES NOT INFORM ITS RETAIL
3 DIVISION OF CONVERSION ORDERS BEFORE THE ORDER IS
4 COMPLETED?

5 A. No. If that were true, how can one explain that in November and December
6 2000, 297 IDS customers were won back by BellSouth prior to completion of
7 their conversion to IDS?

8 B. Unauthorized Switch Back to BellSouth.

9 Q. BELLSOUTH, IN THE REBUTTAL TESTIMONY OF MS.
10 ROKHOLM, STATES THAT IT OBTAINS LOAs (LETTERS OF
11 AUTHORIZATION) AND TPVs (THIRD PARTY VERIFICATION)
12 FOR ALL CUSTOMERS THEY "WIN BACK" TO BELLSOUTH.
13 MR. KRAMER, DO YOU BELIEVE THIS TO BE A FAIR AND
14 ACCURATE STATEMENT?

15 A. No. Ms. Rokholm's testimony is incomplete and attempts to mislead the
16 Commission. In January 2001, IDS randomly called a number of customers
17 who had left IDS to return to BellSouth between December 2000 and January
18 2001, to see whether they had agreed to do so by signing a Letter of
19 Authorization or agreeing to be recorded for a Third Party Verification.
20 None of the customers told us they had signed a Letter of Authorization or
21 had agreed to be recorded for a Third Party Verification. Based in part on
22 this investigation, IDS wrote to Risk Moses of the Florida Public Service
23 Commission and supplied him with a list of approximately 633 former IDS

1 customers for further investigation. See letter with attachments, attached as
2 Exhibit KK-23.

3 **C. BellSouth's Use of CPNI.**

4 **Q. IN ADDRESSING BELLSOUTH'S USE OF CPNI IN WINBACK**
5 **CAMPAIGNS, JOHN RUSCILLI, ON PAGE 17-18 OF HIS DIRECT**
6 **TESTIMONY, STATES THAT WINBACK CAMPAIGNS ARE A**
7 **"NATURAL OUTGROWTH OF THE MARKET DEVELOPMENT**
8 **CONTEMPLATED BY THE ACT AND SUPPORTED BY BOTH THIS**
9 **COMMISSION'S AND THE FCC'S RULES REQUIREMENTS."**
10 **COULD YOU ADDRESS MR. RUSCILLI'S COMMENTS, PAYING**
11 **PARTICULAR ATTENTION TO THE FCC'S VIEW ON THE USE OF**
12 **CPNI IN WINBACK MARKETING EFFORTS?**

13 **A.** Mr. Ruscilli's testimony regarding the competitive benefits of winback
14 campaigns, and in particular, the use of CPNI in those campaigns is
15 misleading. Although the FCC in its September 3, 1999 Order on
16 Reconsideration and Petitions for Forbearance, CC Docket No. 96-149
17 (Order 99-223)("Order on Forbearance") did loosen the restrictions on a
18 carrier's use of CPNI in winback promotions, the Order on Forbearance falls
19 well short of providing carriers with authority for unbridled use of CPNI in
20 winback efforts.

21 **Q. WHAT DOES THE FCC STATE REGARDING THE USE OF CPNI IN**
22 **WINBACKCAMPAIGNS?**

1 A. In its Order on Forbearance, the FCC relaxed its previous restrictions to allow
2 carriers to use CPNI to regain customers who have already switched to
3 another carrier. Those winback efforts, however, are limited to the marketing
4 of the service or services to which the customer previously subscribed.
5 Significantly, the FCC also ruled that carriers could not use CPNI gained
6 through the provision of carrier-to-carrier service, *i.e.*, notice of the
7 customer's imminent cancellation of service, to undertake "retention"
8 campaigns as to these "soon-to-be former customers." The FCC noted that
9 such restrictions were necessary to promote competition and protect customer
10 privacy:

11 We conclude that competition is harmed if any carrier uses
12 carrier-to-carrier information, such as switch or PIC orders, to
13 trigger retention marketing campaigns, and consequently
14 prohibit such actions accordingly. Congress expressly
15 protected carrier information in section 222(a) by creating a
16 duty to protect the confidentiality of proprietary information
17 and contains an outright prohibition against the use of such
18 information for a carrier's own marketing efforts. As stated in
19 the CPNI Order, Congress' goals of promoting competition
20 and preserving customer privacy are furthered by protecting
21 competitively-sensitive information of other carriers,
22 including resellers and information service providers, from

1 network providers that gain access to such information
2 through their provision of wholesale services.(¶77)

3

4 Thus, a carrier can only attempt to "retain" customers if it learned of
5 the information about a customer switch through independent retail means.
6 Any such "retention" campaign would also be limited to the marketing of
7 services to which the customer previously subscribed.

8 At the Change of Control forum, all ALECs, except Birch Telecom,
9 agreed not to use CPNI in an effort to win back customers. BellSouth's use
10 of such information gives it an unfair competitive advantage over all other
11 ALECs. As the Wall Street Journal put it, it is like BellSouth is playing
12 poker using their deck and they know the hand that every one else is playing
13 with. See WSJ article dated August 31, 2001 attached as Exhibit KK-24.

14 **D. Winback Before IDS Knows That Conversion is Complete.**

15 **Q. BELLSOUTH CLAIMS THAT IN ORDER FOR CUSTOMERS TO**
16 **RETURN TO BELLSOUTH BEFORE THEIR CONVERSION TO IDS**
17 **WAS COMPLETE, IDS MUST CANCEL THE PENDING ORDER.**
18 **HOW CAN BELLSOUTH WINBACKCUSTOMERS BEFORE IDS**
19 **EVEN KNOWS THAT CONVERSION WAS COMPLETE?**

20 **A** If BellSouth waits until the conversion is complete, but prior to LENS
21 updating the CSR (which takes 24-48 hours according to Mr. Clements's
22 testimony), and contacts the end user customer, BellSouth can win back the
23 customer before IDS even is notified that the conversion was completed.

1 **E. Truck Roll.**

2 Q. **CAN YOU EXPLAIN THE PRACTICE KNOWN AS A TRUCK ROLL**
3 **AND WHEN SUCH AN ACTION WOULD BE IMPROPER?**

4 A. Truck Roll is the action of BellSouth sending a service technician to a
5 customer's premises. This should not happen for an as/is conversion of a
6 customer from BellSouth retail to IDS. Unfortunately, BellSouth has
7 repeatedly sent technicians to the customer's business and the technicians tell
8 the customer that they are there to disconnect the customer's service because
9 they are switching to IDS. The customer is confused, states that he/she does
10 not want their service disconnected and BellSouth "Wins Back" the customer.

11 **F. Defamatory Comments Regarding IDS**

12 Q. **HOW DO YOU RESPOND TO BELLSOUTH'S CLAIM THAT IT**
13 **REACTED PROMPTLY TO ADDRESS THE FACT THAT ITS**
14 **TELEMARKETERS WERE MAKING FALSE AND DEFAMATORY**
15 **STATEMENTS REGARDING IDS?**

16 A. Mr. Ruscilli suggests that BellSouth "took immediate action" to investigate
17 the allegations and ultimately fired one telemarketing agency. Mr. Ruscilli
18 fails to mention that IDS first brought this issue to BellSouth's attention by
19 notifying Ms. Pryor of the problem in April 2001. However, it was not until
20 July 2001 (after IDS filed its Complaint with this Commission) that
21 BellSouth fired its telemarketing firm. BellSouth's claimed corrective
22 actions are not, and cannot be, by the very nature of BellSouth's role,

1 effective enough to protect companies such as IDS from past and future
2 abusive conduct by BellSouth.

3 **G. Misleading and Anticompetitive Advertising**

4 Q: **MR. RUSCILLI CONTENDS IN HIS DIRECT TESTIMONY (AT**
5 **PAGE 12, LINES 23-24) THAT "BELLSOUTH HAS NOT, AND IS**
6 **NOT, ENGAGING IN ANTICOMPETITIVE ACTS AGAINST IDS . . .**
7 **." HOW DO YOU RESPOND TO THIS CONTENTION?**

8 A: Nothing could be further from accurate. In fact, BellSouth's anticompetitive
9 tactics do not stop at the disparity in its provisioning of OSS and winback
10 programs. BellSouth publicly has portrayed ALECs and their services as
11 unreliable, and has intentionally mislead consumers by implying that
12 telephone service disruptions are more prevalent among ALECs. BellSouth
13 has done this through advertisements and otherwise.

14 Q: **CAN YOU GIVE ME AN EXAMPLE OF A SPECIFIC**
15 **ANTICOMPETITIVE AND MISLEADING ADVERTISEMENT**
16 **PLACED BY BELLSOUTH?**

17 A: Certainly. In a recent BellSouth advertisement directed toward small
18 businesses -- IDS's primary target consumer -- BellSouth claims that
19 comparing telecommunication service between an ALEC, such as IDS, and
20 BellSouth is like comparing apples to oranges. The advertisement explicitly
21 states that "Finding cheap communications services for your small business is
22 easy. Finding dependable service isn't. You can get the quality and
23 reliability you've come to expect from BellSouth, now at substantial savings.

1 . . . [Y]ou can't compare apples to oranges!" The sole inference to be drawn
2 from this ad is that problems associated with telephone service will more
3 likely result if the consumer chooses an ALEC as its telecommunications
4 provider. What is not apparent to the consumer from this ad, however, is that
5 the service disruptions alluded to by BellSouth are generally caused by
6 BellSouth – not the ALEC. Of course, BellSouth fails to clarify this in its ad.
7 Now, notwithstanding the fact that BellSouth recently ran this ad in Florida
8 and has run similar ads in other states, Mr. Ruscilli contends that BellSouth
9 has not, and is not, engaged in any anticompetitive activities. *See* BellSouth
10 Advertisement, entitled "There are lots of ways a small business can save"
11 attached as Exhibit KK-25.

12 **Q: DO YOU HAVE ANY ADDITIONAL EXAMPLES OF BELLSOUTH'S**
13 **ANTICOMPETITIVE MARKETING CAMPAIGN AGAINST ALECS?**

14 **A:** Yes. A second specific example of BellSouth's misleading propaganda
15 against ALEC telecommunication service specifically comes to mind. In this
16 ad, BellSouth uses a bridge spanning across a waterway with a gap in its
17 middle to imply, again, that if a small business uses an ALEC as its
18 telecommunication provider, service disruptions are likely to result.
19 BellSouth goes on to state that "[i]t seems like everyone promises to save
20 you money on phone service these days. But if the service doesn't keep you
21 connected, it doesn't really matter if its cheap." Just as with the "apples to
22 oranges" ad, this ad leaves the consumer with the impression that service
23 disconnections are likely to be caused by switching from BellSouth to an

1 ALEC, when if BellSouth complies with its obligations, this should not
2 happen at all. BellSouth is employing the ultimate form of deception: taking
3 service disruptions it has caused, and leading consumers to believe an
4 innocent ALEC is the responsible party. This type of anticompetitive and
5 misleading marketing campaign should not be tolerated. *See* BellSouth
6 Advertisement, entitled "With other savings offers, there may be something
7 missing – like reliable service" attached as Exhibit KK-26.

8 **H. Winback By Providing Discounts Greater Than Avoided Costs**

9
10 **Q. HOW CAN BELL SOUTH AFFORD TO GIVE BUSINESS**
11 **CUSTOMERS DISCOUNTS GREATER THAN ITS AVOIDED**
12 **COSTS?**

13 **A.** BellSouth claims that the discount provided to ALECs on resale is "avoided
14 costs." Yet in Florida, the "avoided cost" discount provided to ALECs on
15 business accounts is only 16.81%, while BellSouth is offering up to 20%
16 discount off their retail business rates to winback business customers lost to
17 ALECs such as IDS. BellSouth therefore provides services to these
18 customers with discounts below their avoided cost discount. BellSouth can
19 afford to do this long enough to drive ALECs out of business.

20 **Q. ON PAGE 11 OF THIS PANEL REBUTTAL TESTIMONY, MR.**
21 **LEPKOWSKI CLAIMS THAT YOU REPORTED TO THE**
22 **COMMISSION AND TO HIM THAT 1,200 OF IDS'S CUSTOMERS**
23 **HAD LOST SERVICE WHILE A HURRICANE WAS**
24 **THREATENING FLORIDA. IS HIS TESTIMONY ACCURATE?**

1 A. No, I told the Commission and Mr. Lepkowski that I was concerned because
2 IDS had an estimated 25 customers without service during the hurricane
3 threat. I later learned that it may have actually been 12 customers who were
4 without emergency services in the face of the threatened hurricane. In either
5 case, I was sincerely concerned for the safety of these customers and it was
6 only with the threat of Commission action that BellSouth restored their
7 service.

8 **III. Clarification of Direct Testimony.**

9 **Q. ARE THERE ANY ADDITIONS OR CLARIFICATIONS OF YOUR**
10 **DIRECT TESTIMONY THAT YOU WOULD LIKE TO MAKE IN**
11 **LIGHT OF THE TESTIMONY PROVIDED BY BELLSOUTH?**

12 A. Yes. Due either to incorrect information I received from BellSouth or to a
13 misunderstanding, there are a few clarifications I wish to make to ensure that
14 my direct testimony is accurate. These corrections include the following:
15 **1) Voice Mail.** I testified regarding the consistent problems IDS had as a
16 result of BellSouth dropping the Voice Mail service or wiping out voice mail
17 boxes when IDS converted customers from resale to a UNE platform.
18 BellSouth goes to great lengths to explain that Voice Mail cannot be
19 converted to UNE-P service while a similar service called MemoryCall
20 Service can be converted to UNE-P. In fact, the IDS customers who
21 experienced the problems with their service during conversion to UNE-P did
22 have MemoryCall Service rather than Voice Mail. These customers'
23 MemoryCall Service function should have been converted to UNE-P without

1 incident, but due to BellSouth's errors or system problems, these IDS
2 customers suffered the loss of features described in my direct testimony. The
3 substance of the allegations against BellSouth remain the same, but reference
4 to Voice Mail should have been to MemoryCall Service throughout.

5 **2) Remote Access.** Reference to Remote Call Forwarding should be to
6 Remote Access. Again, the analysis remains the same.

7 **3) Local Service Freeze.** Reference in my direct testimony to a Local PIC
8 Freeze should have been to a Local Service Freeze. As explained below, a
9 Local Service Freeze is one of the tools available to IDS to protect its
10 customers from unauthorized transfer to another carrier. During a conversion
11 from resale to UNE-P, there is no change in carrier - - only a change in the
12 type of service provided. BellSouth provided testimony (see direct testimony
13 of Janet Miller-Fields p. 10), that on a resale or UNE-P account only the
14 ALEC, that is the BellSouth customer, can request, remove, or change a
15 Local Service Freeze. Despite these facts, when IDS attempted to convert the
16 type of services it provided to its customers with a Local Service Freeze,
17 BellSouth claimed that it could not convert the accounts from resale to UNE-
18 P without a written authorization from the end-use customer to effect the
19 change. Ultimately, after a substantial delay, BellSouth agreed to process the
20 conversions without the authorizations. In effect, BellSouth managed to use
21 the Local Service Freeze, designed to protect IDS, to further BellSouth's
22 anticompetitive actions.

1 **4) UNE-P vs. Network Combination.** Prior to February 17, 2001
2 BellSouth provided network combinations. After the FCC's 319 Remand
3 Order these services were provided in a platform referred to an unbundled
4 network element platform or UNE-P. Therefore, any reference to UNE-P for
5 periods prior to February 17, 2000 should be a reference to Network
6 Combinations.

7 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

8 A. Yes.

1 BEFORE THE FLORIDA PUBLIC
2 SERVICE COMMISSION

3
4 In re: Complaint of IDS)
5 Long Distance, Inc. n/k/a)
6 IDS Telcom, L.L.C.,) Docket No.
7 Against BellSouth) 010740-TP
8 Telecommunications,)
9 Inc., and Request for) DEPOSITION OF:
10 Emergency Relief.) PETRA PRYOR

11
12
13 S T I P U L A T I O N S

14 IT IS STIPULATED AND AGREED, by
15 and between the parties, through their
16 respective counsel, that the deposition
17 of:

18 PETRA PRYOR

19 may be taken before Cindy Gregg, Notary
20 Public, State at Large, at the offices of
21 BellSouth Telecommunications, Inc., 600
22 19th Street North, Birmingham, Alabama,
23 on the 16th day of August, 2001,
 commencing at approximately 8:50 a.m.

BAIN & ASSOCIATES

Docket No. 010740-TP
Exhibit _____ (KK-13)
Page 1 of 3

1 Q And those system designers, do
2 they include the people that design the
3 LCSCs, those kind of systems? Or what
4 kind of systems are you talking about?

5 A The people that would work on
6 answering questions from a technical
7 standpoint, pricing and designing
8 networks.

9 Q Pricing and designing
10 networks. What type -- precisely what
11 kind of networks are you talking about?

12 A That depends on the customer's
13 application.

14 Q What types of applications are
15 we talking about? I'm just trying to get
16 some idea of what you are talking about.
17 The UNE-P, resale, all of that, is that
18 what you are talking about?

19 A All of the wholesale products
20 and services that we would offer to a
21 customer.

22 Q All right. Do you have any
23 personal awareness of what the profit

1 margin is for BellSouth when it provides
2 resale services to a CLEC like IDS?

3 A No.

4 Q So you are in charge of
5 wholesale products being provided to
6 CLECs, but you don't know what the profit
7 margin is for BellSouth on that, that's
8 what you're saying?

9 A That's what I said.

10 Q So you don't know the profit
11 margin for providing UNE-P services to
12 CLECs for BellSouth?

13 A I'm not in the finance
14 department.

15 Q Who would we ask that question
16 to?

17 A Product managers.

18 Q Product managers. Who are
19 those people? Are they in your
20 organization?

21 A They not in my organization.

22 Q What organization are they in?

23 A They report up to our

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
STATE OF FLORIDA

In the Matter of: :
 : Docket No.
COMPLAINT OF IDS LONG DISTANCE, : 010740-TP
INC. n/k/a IDS TELCOM, LLC, AGAINST:
BELLSOUTH TELECOMMUNICATIONS, INC. :
AND REQUEST FOR EMERGENCY RELIEF :

The deposition of GLORIA BURR, taken in the
offices of BellSouth, 675 W. Peachtree Street, Atlanta,
Georgia 30375, commencing at approximately 9:01 a.m.,
before William L. Warren, Court Reporter.

1 BY MS. SUMMERLIN:

2 Q What time frame are you thinking about when you
3 say yes to that question?

4 A I'm thinking of the time frame early to mid-May
5 through sometime in June that this occurred.

6 Q Okay. Are you talking about the same time that
7 you believe they did a beta test?

8 A Yes.

9 Q Okay. What were the results of that beta test in
10 mid-May to mid-June?

11 A What were the results?

12 Q Yes.

13 A Eventually the results were satisfactory.

14 Q Okay. What about the first results?

15 A There were occasions when IDS submitted the beta
16 on beta customers through LENS. This is LENS. That there
17 were fallout and there was an assigned test manager to
18 ensure that there were no critical impacts to IDS, or to
19 minimize them.

20 Q Okay, who was the test manager?

21 A Fay Williams.

22 Q Okay. And so what is your memory of what the
23 results were of that beta testing process, just in general?

24 A During the course of the beta testing there were
25 problems with hunting, there were problems with local

1 ordering product to help CLECs process UNE-P orders as
2 easily as possible, is that what you were saying or not?

3 A That was -- from what I understand, BellSouth
4 decided to use that product to do that. They didn't offer
5 it from what I understand. The meetings that I was in, that
6 was one of the -- one of the tools they were going to use.

7 Q One of tools they were going to use for what?

8 A For offering the 319 product to CLECs so that they
9 could take advantage of that product quickly.

10 Q They could take advantage of the UNE-P products in
11 general?

12 A Yes, the UNE-P product, right.

13 Q The UNE-P product. So at this point in time,
14 BellSouth hasn't offered that bulk ordering product to
15 CLECs?

16 A In the meetings I was in, no, not yet.

17 Q Okay. Does BellSouth no longer want to help CLECs
18 process their UNE-P orders?

19 A I can't -- I don't know. That's corporate
20 strategy and I don't know.

21 Q Okay. So you don't really know what the corporate
22 strategy was back then when they offered the bulk ordering
23 product?

24 MR. MEZA: I object to the form of the question.

25 MS. SUMMERLIN: Is that correct?

1 MR. MEZA: She testified very clearly what it was.

2 MS. SUMMERLIN: No, I'm asking, wasn't it a
3 corporate strategy at that time, also?

4 THE WITNESS: At that time it was part of the
5 corporate strategy.

6 BY MS. SUMMERLIN:

7 Q Earlier in the deposition you told me, I believe,
8 that you were in an umbrella position over individuals that
9 were developing the UNE-P project and individuals that were
10 developing the bulk ordering for the UNE-P project.

11 A No

12 Q Product, I mean. You -- I asked you that several
13 times and you said yes. If I'm unclear about what your job
14 was, I want you to tell me now what it was.

15 A My job was a requirements manager. I was the
16 single point of contact within my group for the UNE-P
17 product, all of them.

18 Q For all of the products?

19 A For all of the UNE-P and the UNE products. That
20 was my job responsible.

21 Q So that was both the UNE-P two-wire, 319 product
22 and --

23 A Right, user requirements only.

24 Q -- the bulk ordering product?

25 A No, not bulk ordering. Bulk ordering and UNE-P

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January 31, 2000

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Introduction

Purpose

The purpose of these training materials is to familiarize users with the TrustedLink[™] Commerce (TLC) PC Package.

The specific template that we will be addressing in this customized training is UNE. This template supports the ordering of Network Combos.

For the most part, the package supports EDI coding rules and limited business rules so that EDI-error-free transaction sets are output for transmittal to the LEO/LSRR system.

Objectives

When the training session is completed, the participant should be able to:

1. Understand the basic purpose of the TLC software to generate and to view EDI outbound transaction sets (documents).
2. Understand how to maneuver through the Document Manager features using buttons/icons/pulldown options
3. Use the UNE templates to generate 850 documents
4. Understand the Document Manager features to send and receive EDI documents to and from the LEO system
5. Use the Document Manager special features to create customized templates, create 860 documents from existing 850 documents, check Functional Acknowledgment reports, and to view audit and error logs

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Understanding TLC and its Use

TrustedLink Commerce™ (TLC) Software

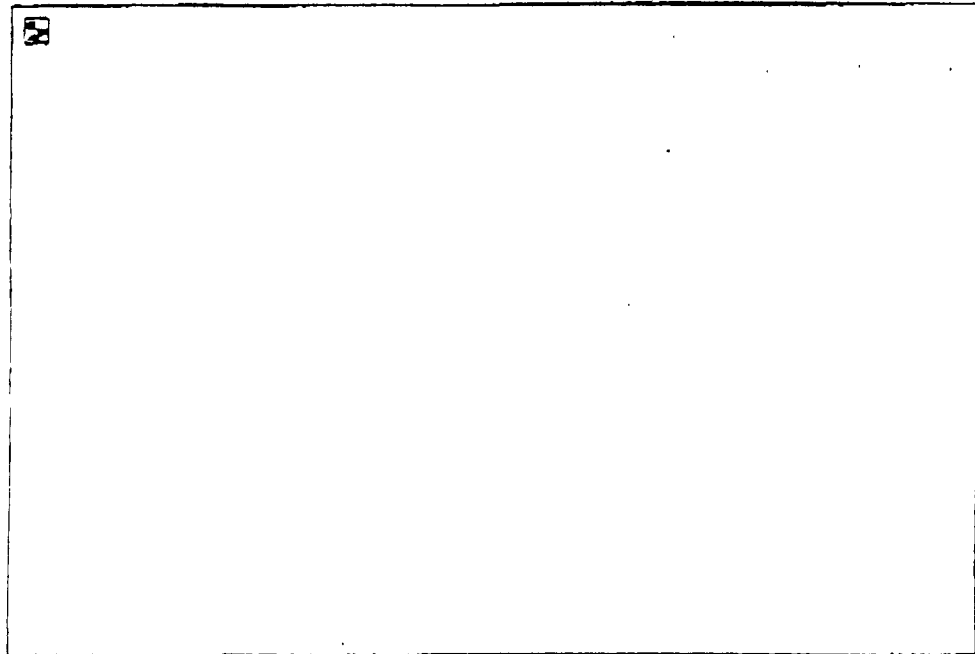
Electronic Data Interchange (EDI) is the computer to computer exchange of documents in a standard electronic readable format.

The input person doesn't need to have expertise in EDI or even to understand it. The input person simply enters data onto screens, and when complete, the TLC software creates an EDI transaction set for eventual transmittal to the LEO system.

Conversely, when the LEO system sends back a "response" document, the TLC user retrieves it for on-screen display and/or data printout. The creation and translation of EDI documents is performed by the TLC software.

The picture below shows the ordering process when using the TLC software package. The picture depicts the importance of the VAN (Value Added Network) in Local Exchange Ordering at BellSouth. A VAN is a value added network that either holds the data transmission for retrieval by the receiving party or sends it when appropriate. All transmissions using the TLC package at BellSouth go through the Harbinger VAN.

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Types of Transaction Sets

Templates to create EDI Transaction Sets employed for Local Exchange Ordering are listed below. The 850 and 860 templates allow creation of outbound documents (outbound from the PC package to the LEO/LSRR system). The 855/865 screens allow viewing of inbound documents from the LEO system.

850 Transaction Sets

850 (Purchase Order) transaction sets are outbound documents used for ordering local exchange services from BellSouth. The following templates allow creation of these documents:

- BellSouth LEO Resale (850) - **Not included in this UNE training.**
- BellSouth LEO UNE (850) - **This training will only address the UNE.**

860 Transaction Sets

860 (Purchase Order Change) transaction sets are outbound documents used to change or cancel an original 850 document. In BellSouth these documents

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are also referred to as SUPs. The following templates allow creation of these documents:

- BellSouth LEO Resale (860) - Not included in the UNE training.
- BellSouth LEO UNE (860) - This training will not be able to demonstrate the SUP since orders will not be sent through the system.

The 860 screens are identical to the 850 screens with the exception of three fields on the LSR tab that require data: SUP, LSR No., and VER.

Note: The TLC package has a "Generate Response" feature which creates an 860 for a previously submitted 850 transaction set, making it unnecessary for the user to create 860s from scratch.

855/865 Transaction Sets

The 855/865 "exchange" feature will provide the CLEC the ability to view FOC/CN/Error/POS/Jeopardy and data. Both 855 and 865 documents are viewed via almost identical screens of the TLC package. The difference in the screens is the additional field on the 865: VER.

The basic function of an "inbound" 855 Purchase Order Acknowledgment is to acknowledge that a Purchase Order (850) was received by the BellSouth systems (Firm Order Confirmation).

The 865 Purchase Order Change Acknowledgment basically functions as an acknowledgment that a Purchase Order Change Request (860) was received by the BellSouth systems (FOC). It also is used to notify the CLEC that the order has been completed (Completion Notice).

The 855 and 865 documents are also used to provide the following order statuses:

- Request for Clarification
- Reject Notification
- Pending Order Status
- Jeopardy Notification

997 Functional Acknowledgments

BellSouth's agreement with each trading partner requires that all EDI transactions are recognized by automatic transmission of 997 Functional Acknowledgments (FA). A Functional Acknowledgment is a computer-to-

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computer document exchange, indicating receipt of an EDI document. The 997 is either positive, indicating that the document was EDI syntactically correct, or negative, indicating it contained errors.

In the case of testing with the TLC package, when the BellSouth EDI translator receives and translates an 850 or 860 EDI document from the TLC package, a 997 Functional Acknowledgment will be generated and sent. Because the TLC package is designed to create EDI-syntactically correct documents, for the most part, only positive 997s will be issued (see the first point under Issues with Testing Business Rules via EDI Translator section on page 14).

The TLC package user will be able to retrieve and read these 997s to ascertain that the document was received by the BellSouth EDI translator. The FA Delinquency Report feature shows when documents were not received by the intended party.

When the TLC package user retrieves "inbound" 855/865 documents, the TLC package automatically generates and sends 997s to the sending machine (in this case, the BellSouth EDI translator).

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Document Manager – General

Main Screen Toolbar

The following depicts the icons on the Document Manager main screen.



1 2 3 4 5 6 7 8

1. The *Save Button* saves a document.
2. The *Print Button* allows printing of a document.
3. The *Queue for Send Button* marks the document for transmission (envelope) during the next exchange.
4. The *Generate Response Button* allows generation of an 860 document from the current 850 document (if it has response capabilities)
5. The *Complete Button* marks the current (inbound only) document as complete
6. The *Export Button* button converts the current document to an intermediate file format that other applications, such as accounting or warehousing software, can read.
7. The *Sticky Note Button* allows entry of a brief message to yourself or your co-workers about a particular part of a document. The message does not become part of the document; it is removed automatically during transmission.
8. The *Error Log Button* is used to display a list of problems encountered during Document Manager operations.

All of these actions can also be invoked from the pulldown menu options.

Document Worklist

The main screen of the Document Manager displays both Outbound and Inbound documents on the Document Worklist. The worklist can be filtered by the following statuses. Documents are named by the contents of the PON field.

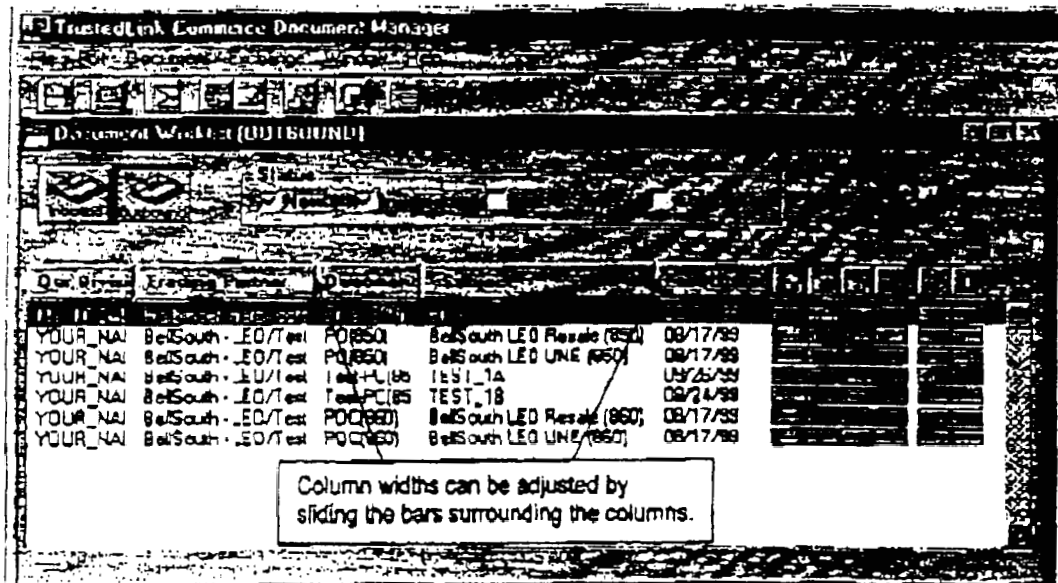
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- New - Lists available templates (outbound) and responses that have not yet been viewed (inbound)
- In Work - Lists documents that are in process
- To Be Sent - Lists documents that have been completed and enveloped
- Complete - Lists documents that have been sent (outbound)

The screen below shows available Outbound documents that are New and In Work.

Note: The Email selection can be used to send informal messages and computer files between trading partners; however, this feature will not be used in OSS'99 testing.

- New (templates)
 - BellSouth LEO Resale (850)
 - BellSouth LEO UNE (850)
 - BellSouth LEO Resale (860)
 - BellSouth LEO UNE (860)
- In Work (LSRs that are in process)
 - TEST_1A
 - TEST_1B



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Column Descriptions

The columns of information displayed on the Document Worklist (see picture above showing Outbound documents) represent the following:

1. Our Division – The name of the TLC software owner
2. Trading Partner – Trading partner identification (includes whether document is Test or Production status)
3. Document – Type of EDI document
4. Subject – name of template or document in work (documents are displayed by PON)
5. Received – date received (displayed for Inbound documents)
6. Last Update – date document was last saved (displayed for Outbound documents)

Action Icons

Action icons provide additional information about the documents in the Document Worklist. The status of each Action Icon answers questions such as:

- Can this document be printed?
- Has this document been sent?
- Does this document contain errors?

These Action statuses for Inbound and Outbound documents are described below. Clicking on an icon provides a definition at the bottom of the screen.

Inbound document Action Icons



1 2 3 4

1. Print Status
 Document has been printed

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- blank Document can be printed, but has not been
 — Document cannot be printed
2. **Export Status**
 ✓ Document has been exported
 blank Document can be exported, but has not been
 — Document cannot be exported
3. **Response Status**
 ✓ Document has been generated from the associated reply
 document
 blank Document is associated with a reply document, but a response
 has not been generated
 — Document has no response capabilities
4. **Error Status**
 E Document has validation errors (reopen document for
 information about the errors)
 blank Document has no validation errors

Outbound document Action Icons


1 2 3 4 5 6

1. **Print Status**
 ✓ Document has been printed
 blank Document can be printed, but has not been
 — Document cannot be printed
2. **Import Status**
 ✓ Document was imported
 blank Document was not imported
3. **Export Status**
 ✓ Document has been exported
 blank Document can be exported, but has not been
 — Document cannot be exported

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4. Acknowledgment Status (997 FA)

- √ Trading partner acknowledged the document
- blank Trading partner has not acknowledged the document
- Document does not require acknowledgement

5. Send Status

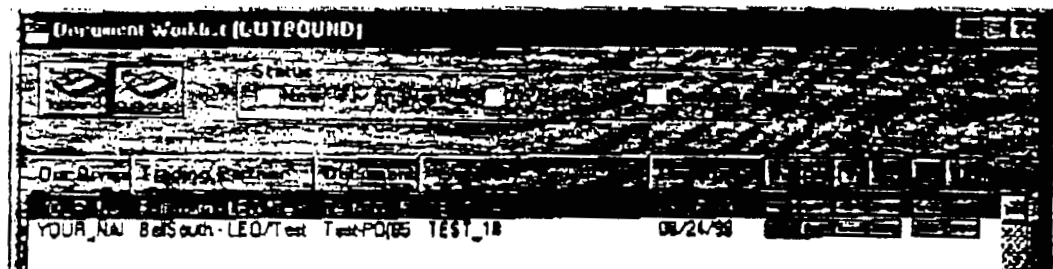
- √ Document has been transmitted
- blank Document is not ready to be transmitted
- H Document ready to be transmitted, but has been placed on hold
- R Document ready to be transmitted
- I Document has been processed with Send Immediately command
- T An error occurred during transmission, preventing the document from being sent

6. Error Status

- E Document has validation errors (reopen document for information about the errors)
- blank Document has no validation errors

Example

The Action icons in the picture below reveal information about two Outbound documents. Details about the first document are described.



The Action statuses for the first document, TEST_1A, indicate:

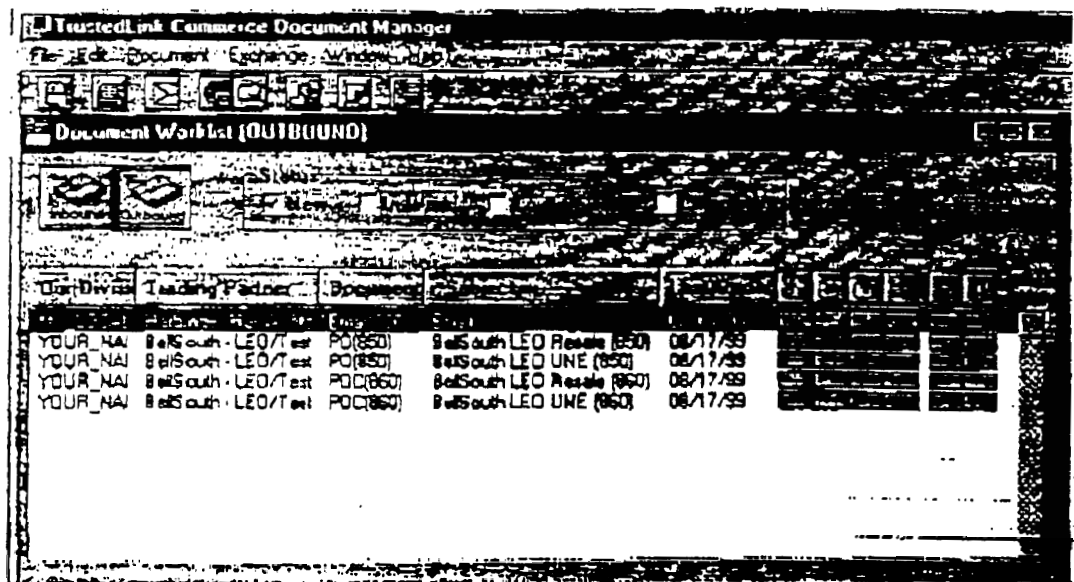
- The document can be printed
- It was not imported
- It can be exported
- It has not been acknowledged by trading partner (997)
- It is not ready to be transmitted
- It contains EDI validation errors.

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Using Document Manager Templates

Creating Outbound Documents

The Document Manager's Document Worklist displays the available templates when the Outbound button is active and the New status checked.



Selecting a Template

Double-clicking on the desired template will provide the chosen template's screens for data input.

Each template is made up of several tabs, some that gather header information and some that gather detail information.

Header Tabs

LSR Contact Billing End User

Detail Tabs

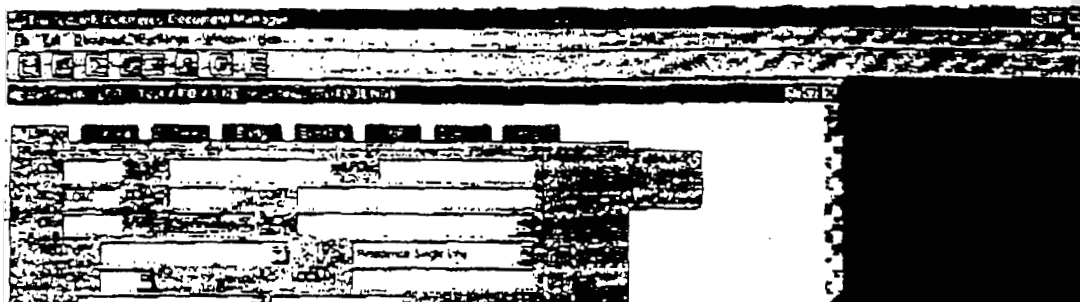
UNE Directory

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The History Tab displays information about the document such as when created, when sent, etc.

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The screen below shows the result of double-clicking on the BellSouth LEO UNE (850) selection. The 850 UNE template is provided for entering data.



Fields on Tabs

- As stated above, fields are grouped as Header or Detail according to the tab on which they reside. Header fields are sent once on an LSR. Detail fields can be sent numerous times.
- Fields sometimes appear on the tabs in an order that may seem unusual or out of place. This is due to where the information will be relayed on the underlying EDI document.
- The LEO system checks the impacted records in order to handle these peculiarities.

Navigating Through the Screens

- The tab key can be used to navigate through the fields.
- The scroll bar will be visible on the right of the screen when there are more fields on that tab than can be initially displayed.

Error Conditions

- There are edits in place in the TLC package to enforce entry of valid EDI ANSI X12 data. Although the TLC templates are not built to enforce business rules, they are built to enforce most EDI coding rules in order to create valid EDI transaction sets.

Where the TLC package will accept, for instance, only a one-character

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entry, it is because the underlying EDI transaction set will accept only one character in that data area.

- EDI errors may be evident at different times during creation of an LSR:
 - When tabbing off a field
 - When invoking Queue for Send, an "E" appears in the Action Status line indicating there is an error in the document
 - When reopening a document after a Save or Queue for Send command
- If the error condition does not generate an on-screen error message, examination of the Error and/or Audit Log may be of assistance.

Date Fields

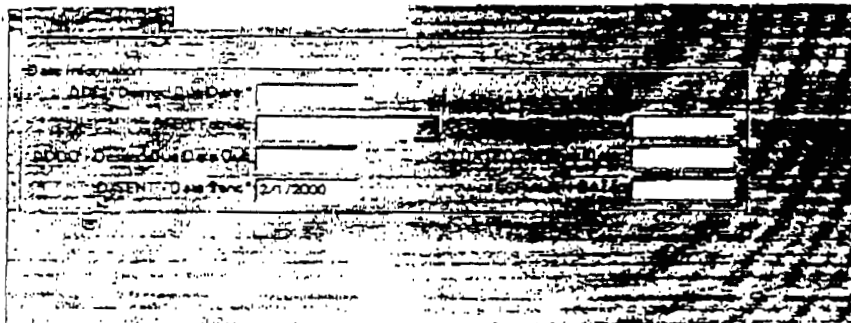
- Date fields are entered as month-day-year and result in MM/DD/YYYY format in the underlying EDI document. The system will convert an M/D/YY entry to the Y2K-compliant, 8-character date format. An error message will be displayed, however, if an invalid date is entered (e.g., 02/30/1999).

Note: Although some PCs are configured to display a 6-character date format, the underlying code will be correct. The display for date fields for a windows-based PC is configured in the Control Panel's Regional Settings/Date section.

Fields Requiring Two Entries – Dropdown Choice and Data Entry

- Occasionally there are fields on the screen that require a selection from a dropdown menu in addition to the entry of valid data. In most cases, this is to accommodate an EDI ANSI ASC X12 requirement.

In the example shown below, the DFDT field require two entries: 1) either a range or a single time; and, 2) a time in military format. If one part of the 2-part entry is omitted, an error condition will occur. The error condition may not be evident until an attempt to send the document is



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made.

Note: When encountering these type fields, typing in the first letter(s) in the dropdown portion of the field will populate that part and allow tabbing to the next part for data entry.

In the example above, the DFDT Format dropdown, typing "R" will select the "Range of Time HHMM-HHMM" option (or "T" to select the single Time option), then pressing the tab key will move the cursor to the DFDT Value field.

Field Dependencies

- Several Data Element fields are dependent on other fields.

The CCNA field on the LSR is a good example. The CCNA field is tied to the Initiator information on the Contact tab. This is due to how it is mapped on the EDI transaction set. If the CCNA field is not populated and data is entered in the INIT field, the following error message will be



displayed when tabbing off the INIT field:

There are many other fields in the package that have these dependencies. For example, DSGCON STREET information cannot be entered before DSGCON is populated and BILLCON-FB must be populated before the TELNO-FB field.

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When an error message is encountered the "parent" field must be populated before the "child" field can accept data.

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Sending Documents

The Document Manager is used to send (and receive) EDI documents to and from the LEO/LSRR system via the VAN. A single document can be sent immediately or can be queued for sending along with other documents. These two options for sending documents are explained below.

Saving Documents

Documents can be saved as they are being completed by one of these methods:

- Selecting "Save" from the File pulldown menu
- Typing CTRL/S
- Clicking the Save button

After a document is saved, it will appear in the Document Worklist Subject column by its name, which is derived from the PON field.

Queue for Send

- **Queue for Send (Enveloping)** – places the document in the Document Worklist, marked to be sent during the next transmission to the VAN (see Exchange Process below). The Queue for Send command can be issued while the document is open or by selecting the document from the Document Worklist. When the command is issued, any changes that have been made to an open document are saved.

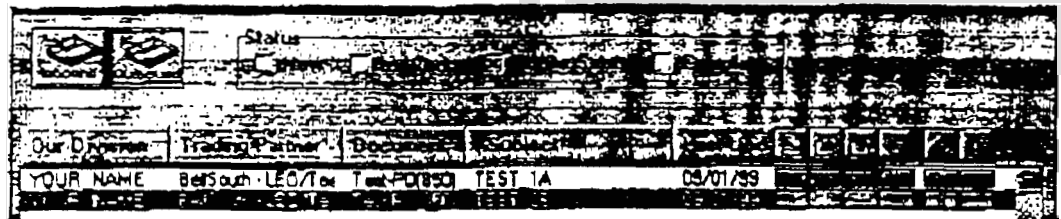
- 1) Select Option A or Option B:
 - A. Open the desired document, or
 - B. Highlight the desired document in the Document Worklist
- 2) Select Option A or Option B:
 - A. Select Queue for Send from Document pulldown options, or
 - B. Click on the Queue for Send icon (envelope)

The Queue for Send feature also validates that the data in the LSR is EDI syntactically correct. If a document passes the EDI validation checks, it is placed in a "To Be Sent" status.

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Send Immediately

- Using the Send Immediately option executes a "send" of a single document to the VAN. This option can only be performed on documents that are in To Be Sent status as a result of the Queue for Send EDI validation checks. Documents with To Be Sent status will have an **R** in the column below the Send Status Action Icon, as shown below for TEST_2B. After the command has been executed, the document will appear in the Document Worklist with a Send status of **I**, also shown below for TEST_1A.



To execute the Send Immediately command:

- 1) In the Outbound Status mode, select the To Be Sent check box.
- 2) Highlight the desired document in the Document Worklist
- 3) Select Send Immediately from Document pulldown options

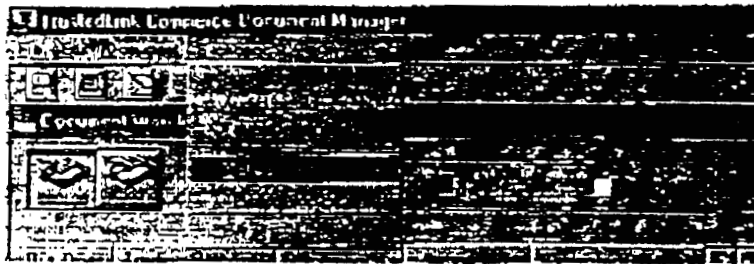
Exchange Process

The Exchange process involves exchange of both inbound and outbound documents between the TLC user's machine and the VAN. These exchanges can be made manually, or they can be set up to run automatically.

To perform a Manual Exchange to exchange documents with the VAN (for transmittal on to LEO/LSRR), follow these steps:

- From the Exchange menu, select Manual

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- When the Manual Exchange dialog box is displayed, select **Test** and highlight the Exchange ID to be exchanged.



There are three types of Manual Exchanges that can be made:

- **Option 1**
To perform a Manual Exchange to (only) Send documents to the VAN (for transmittal of 850/860s to LEO/LSRR), select the **Send Only** button. All documents that are in **To Be Sent** status will be sent.
- **Option 2**
To perform a Manual Exchange to (only) Receive documents from the VAN (997s and 855/865s from LEO and LNP), select the **Receive Only** button. All functional acknowledgements (997s) and inbound FOC/CN/Status documents that are waiting at the VAN will be received.
- **Option 3**
To perform a Manual Exchange to both Send and Receive documents

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from the VAN, select the Exchange button. Both outbound and inbound documents will be exchanged.

Receiving Documents

The Document Manager module is used to receive EDI documents that have been sent to the VAN from the LEO or LNP systems. The Manual Exchange process described above is the vehicle for this exchange. The Manual Exchange process can be used to receive inbound documents in two ways: Receive Only or Exchange (send and receive at the same time).

The types of documents that can be received during the Manual Exchange process are described below:

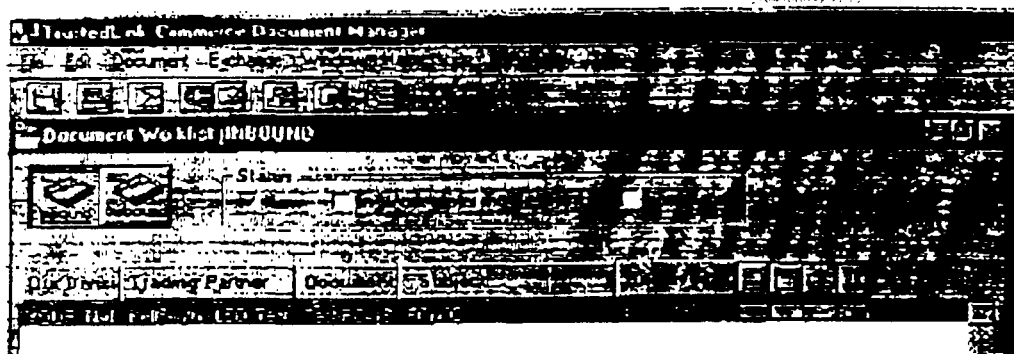
997 Functional Acknowledgments

These are EDI documents acknowledging receipt between the main EDI translator and the TLC package. The 997s also indicate whether the EDI document was syntactically correct.

855s/B65s

The types of "response" documents that may be received are: FOCs, CNs, Requests for Clarification, Rejects, Pending Order Statuses, Jeopardies, and Completion Notices.

Once received by the TLC package, viewing/printing can be accomplished by selecting the document from the Inbound list of documents in the Document Worklist, as shown below. The Document Worklist can be filtered to display only those documents that have not yet been viewed by selecting the New status box.



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The TLC package receives the data from the VAN and translates it to be displayed on the user's screen. The following is an example display of 855 FOC data on the CLEC tab which contains Header type information. The 855 and 865 documents are displayed on similar screens (the 865 has 3 additional fields on the CLEC tab).

Valid LSR Statuses are detailed in the table on the next page

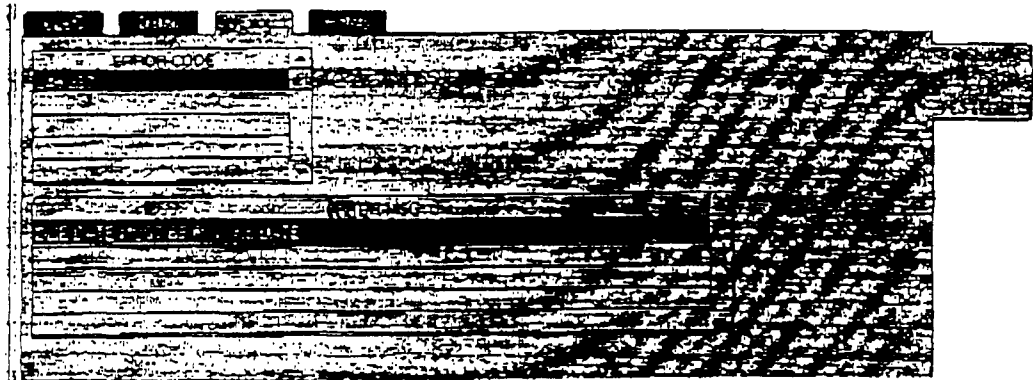
When populated, additional reference numbers can be displayed by scrolling.

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The table below shows valid LSR Statuses that may be displayed.

Valid LSR Statuses	
Confirmation	Accepted FOC
Confirmation	Clarification (860 Required)
Confirmation	Reject (850 Required)
Status	Status (No Action Required)
Transaction On Hold	Jeopardy (New Desired Due Date Req'd)
Completion Notification * *865 only	Accepted FOC/Completion

Error information sent by the LEO system is displayed when the Error tab is selected.



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Document Manager Special Features

Copying Documents

An Outbound document can be easily copied by using the Copy feature of the TLC package. While the document is open, select the Copy Document from the File pulldown options. A message window will ask for confirmation that the document is to be copied.

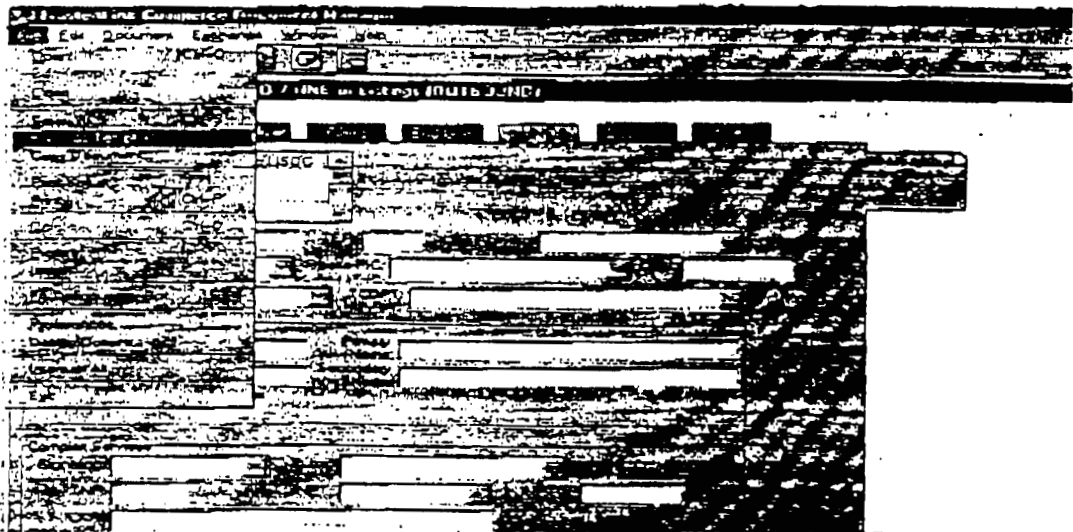


Once the document is copied, opening it from the "In Work" list, changing the PON, and saving will provide a document with the same entries, but with a different name (PON).

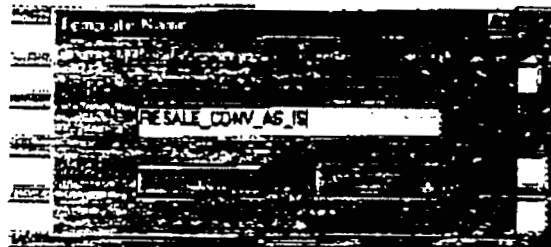
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Creating Customized Templates

If similar information is to be transmitted on several documents, there is no need to reenter the same data each time. Customized templates can easily be created by using the Save As Template feature from the File pulldown menu. Using an existing template, like data is entered and then invoking the Save As Template feature will create the new template for future use.



The template can be given an appropriate name for easy identification.

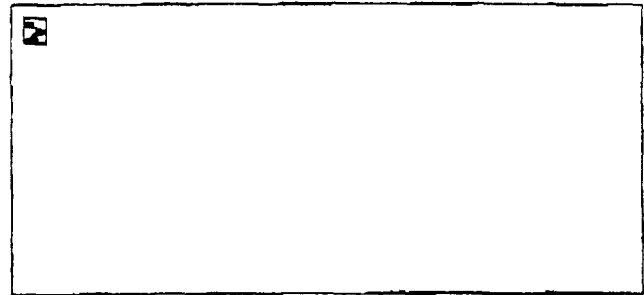
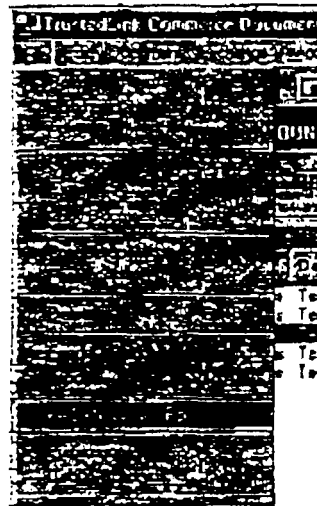


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FA Delinquency Reports

The FA Delinquency Report will assist in determining whether a document was received by the intended party. Checking the report will show which documents were transmitted, but not acknowledged by the receiving computer.

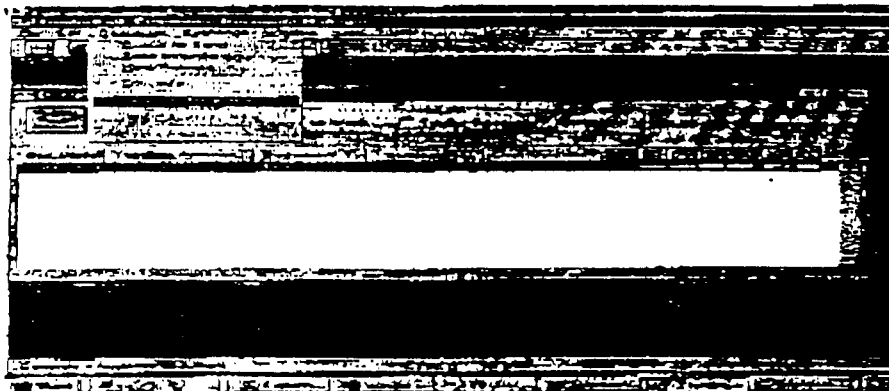
An FA Delinquency Report is retrievable and viewable by selecting the FA Delinquency Report option from the File pulldown menu. While reviewing the FA Delinquency Report, to eliminate a document, select the **Mark Resolved** button and when prompted, indicate the reason it was resolved.



Using Generate Response to Create an 860 from an 850

The Generate Response feature can be used to create an 860 from an existing 850 document that is in Complete status (the document has successfully been transferred from the TLC package to the VAN). Selecting the eligible 850 document from the Document Worklist and selecting the **Generate Response** option from the Document pulldown options creates an 860 document. The Generate Response feature can also be invoked by using the **Generate Response** button.

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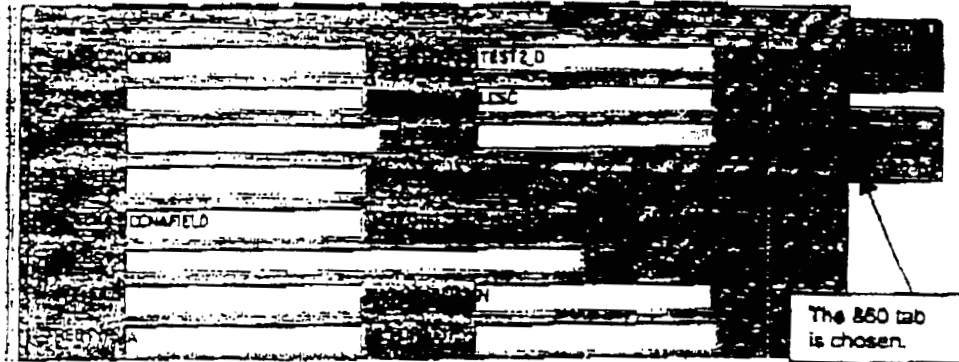


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Two confirmation boxes will be displayed asking for verification that the 860 should be generated, as shown below:



Now, both 850 and 860 documents will be listed in the Document Worklist with the same PON number, but as different document types. When opening the 860 document, there will be two tabs on the right hand side of the screen – one for the 850 and one for the 860 (see below). When selecting the 860, the LSR NO, VER, and SUP fields will be displayed for data entry; all other information will remain as it was on the 850.



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Error and Audit Logs

The TLC package Document Manager module has an Error Log and an Audit Log that can be viewed. These logs may be helpful in determining where EDI syntactical errors have occurred. They are both reachable via the Exchange pulldown menu. The Error Log button can also be used.



Printing

Printing of a document may be helpful to the TLC tester for backup/auditing purposes. An opened or unopened document can be printed by selecting Print from the File pulldown menu or by selecting the Print button.



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Exercises

The TLC training will provide exercises to allow the participant to experience entering data and to review the expected results.

- 1) Use BellSouth LEO 850 UNE template to create a transaction set; print
- 2) Create a customized template

PSC
Wed-P
combo



BellSouth Interconnection Services

From Gary Smart
Department Account Manager / Carrier Sales
Address 10th Floor
600 North 19th Street
Birmingham, Alabama 35203
Telephone: (205) 321-7704
Fax: (205) 321-7740
Internet: smart1@bridge.bellsouth.com
Pager 877-245-8352

To Keith Kramer
IDS Long Distance

Telephone number 305-913-4000

Fax number 305-913-4011

Comments:

Keith, our Facility Planning Managers met in November to discuss budget appropriations with DSL coverage, but it appears our "final" implementation plan has not been revealed. I did find some indication from upper management that we plan to have higher deployments in the Florida and Georgia areas greater than original 65% June 2000 estimates. With a written agreement I can provide you a bulk telephone numbers list of pre qualified ADSL loops, which should help. Also, regarding the UNE combo provisioning, the PE'd order appears to be a BellSouth error and was not caused by errors from your provisioning department. Our staff should have the programming corrections done next week. Also, I'm getting our LCSC managers and Product Managers together for a meeting next week to make sure we hand-carry a dozen or so orders through the system to completion. I'll work with Brad to get that scheduled around your RoboTag workshop. I'll check with you Wednesday morning to make sure you don't have any more concerns.//Gary

Date: December 28, 1999 **Total number of pages** 4 **including this cover**

AGREEMENT FOR PROVISION OF LIST OF ADSL QUALIFIED LOOPS

The undersigned customer (hereinafter "customer") has made an election to take ADSL service from BellSouth Telecommunications, Inc., (hereinafter "Company"). ADSL service is provided pursuant to and subject to the terms and conditions of the Company's Federal Communications Commission Tariff No. 1.

The customer has further requested a list of telephone numbers of ADSL qualified loops (hereinafter "bulk list") for each metropolitan area (hereinafter "metro") where customer plans to sell ADSL service. The list of such metros is contained in the ADSL Letter of Selection signed by the customer. In consideration of the terms and conditions enumerated below, the Company hereby agrees to provide the bulk list to the customer:

1. The Company makes no claim as to the accuracy or completeness of the bulk list. While the bulk list is the Company's best estimation as to the telephone numbers that qualify for ADSL service in a given area, the bulk list will contain errors. Some telephone numbers on the bulk list will not qualify for ADSL service. Some telephone numbers in a given metro not on the list will indeed qualify for ADSL service.
2. The customer will indemnify, defend, and hold harmless the Company and any of its licensors, employees, or agents from and against any and all claims, demands, actions, causes of action, suits, proceedings, losses, damages, costs, and expenses, including reasonable attorneys' fees, arising from or relating to errors and/or omissions in the bulk list.
3. The customer is responsible for acting within the local, state, and federal law governing the use of the bulk list for the purpose of, but not limited to, marketing of BellSouth's ADSL service through direct mail or telemarketing. Furthermore, the customer hereby agrees to refrain from abusive telemarketing practices.
4. The customer will indemnify, defend, and hold harmless the Company and any of its licensors, employees, or agents from and against any and all claims, demands, actions, causes of action, suits, proceedings, losses, damages, costs, and expenses, including reasonable attorneys' fees, arising from or relating to use of the bulk list by the customer. This includes, but is not limited to, use of the bulk list by the customer to sell BellSouth's ADSL service via direct mail and/or telemarketing.
5. Customer agrees that it will use the bulk list and/or any information directly derived from the bulk list for the sole purpose of qualifying and selling BellSouth ADSL service (whether by itself or in a package of other offerings).
6. Customer will not use the bulk list for the purpose of conducting research, marketing, qualifying, or selling products and/or services other than the Company's ADSL service (or a package of services containing Company's ADSL service).

Document #132091

7. Customer will not provide the bulk list, any portion or portions of the bulk list, copies of the bulk list, or any information derived directly from the bulk list to others without the prior written consent of the Company.

8. Customer acknowledges and agrees to the Company's right to revoke and terminate the use of the bulk list by the customer. The Company may exercise this right of revocation and/or termination at any time, for any purpose, by oral or written notice to the customer. In such event, the customer agrees to immediately destroy or return all copies and/or components of the bulk list. For purposes of this paragraph, the term "immediately" shall be defined as a period of time not to exceed forty-eight (48) hours.

BY: IDS Telecom, a Florida Limited Partnership TITLE: _____
SUBSCRIBER/COMPANY NAME: By: IDS Long Distance, Inc. a general partner
ADDRESS: By: Michael Maslow
1525 NW. 167th St. #200 TITLE: President
Miami Fla. 33169

BELLSOUTH TELECOMMUNICATIONS, INC.

BY: _____
TITLE: _____
DATE: _____

POST DEPLOYMENT FORM - 1000

Schedule of Post Deployment Coverage of Homechild to be

to market is listed for ADPT deployment by June 2000

[The main body of the document is almost entirely obscured by a large black redaction box.]

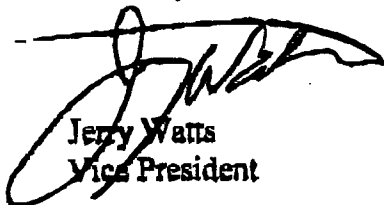
August 27, 2001

Keith Kramer, Senior Vice President
IDS Telecom
1525 N.W. 167th Street
Suite 200
Miami, FL 33169

Dear Mr. Kramer:

In response to your inquiry I have determined that ITC^DeltaCom began processing
UNE-P orders via BellSouth EDI in February 2001. Should you need any additional
information, please let me know.

Sincerely



Jerry Watts
Vice President

Docket No. 010740-TP
Exhibit _____ (KK-17)
Page 1 of 1

~~CONFIDENTIAL~~



BellSouth Interconnection Services

January 8, 2001

IDS Telcom, LLC
Attn: Mr. Keith Kramer
Suite 200
1525 NW 167th Street
Miami, FL 33169

Our records indicate that as of January 8, 2001 your account is past due in the amount of \$2,783,622.35. This amount includes both local and access services, and it takes into account your payment of \$972,459.13 received on January 4, 2001. It also takes into account credits for \$546,039.92 from BellSouth for your claim numbers BS1020200002 and BS1020200001.

As I said in our telephone conversation this morning, the full amount of the past due charges (\$2,783,622.35) must be paid by January 22, 2001. If the payment is not received, requests for additional services will be refused.

Your end-users' service will be interrupted unless full payment is received by February 8, 2001.

If your end-users' service is interrupted for non-payment of regulated charges, a restoral fee will apply for each end-user account upon restoral of service. This may be the only written notification you receive.

If you have any questions, please call me at 205-977-0157.

Sincerely,

Claude P. Morton

Cc: Lynn Smith
Petra Pryor
Whit Jordan
Kelly Stephens
Mary Jo Peed

Angel Leiro

From: mlep@bellsouth.net
Sent: Thursday, April 27, 2000 9:21 PM
To: bhigdon@idstelcom.com; Freddy Oquendo
Cc: rick.hemby@bridge.bellsouth.com; petra.pryor@bridge.bellsouth.com
Subject: IDS Accounts



PKLSFR.XLS



IDSBTN~1.XLS

Here are the spreadsheets show what you have. I am going to see if we have a process for bulk ordering of your orders from resale to UNE 319. If you like to me to pursue this please let me know.

PKLSFR has all your accounts broken down into the status of (res, bus, unfrozen and final billed.

IDSBTN just has what you sent me.

Also I will need to know the following.

1. Are switching all your customers or just Business Customers?
2. Is Bellsouth charging for your orders now? if so what?

Maybe I negotiate something for us to bulk process all 2400 accounts at the same cost you would pay for doing it yourself. I do not know if this is possible but, I will check into it.

I look forward to this being completed.

Michael Lepkowski

Hobbs, Linda

From: Hudson_Terrie_J/m2_mail2a@90.11.245.109
 To: Lepkowski, Michael; Sellers, Regina
 Cc: Cathey, Marcus; Moss_Marcia/m2_mail2a@90.11.245.109; Rand_Pat_A/m6_mail6a@90.11.245.109; Smith_Jean_S/m2_mail2a@90.11.245.109
 Subject: Testing of Bulk Ordering

Marc,
 We need to help test the new bulk ordering feature on LENS with customers who have been ordering loop/port combos and have the new 319 contract signed. We would like to have IOS Long Distance and Uricom test the offering. They will be allowed to continue using the feature if they want to after the testing period.

You should be receiving a call from Jean to set up the parameters with your customer.

Thanks for your support.
 Terrie

Hobbs, Linda

From: Rand_Pat_A/m6_mail6a@90.11.245.109
To: Martin, Landra
Cc: Rand_Pat_A/m6_mail6a@90.11.245.109
Subject: LSF Issue

Landra,
I really appreciate your taking the time to investigate this further.
There appears to be some LESOG programming edits that are inhibiting this CLEC from processing resale to UNE-2 conversion orders on accounts the CLEC has frozen.
Guess we showed them how we could really freeze the account. HA!

THANKS for the extra help!

Pat

w->Pat,
w->I checked the Local Service Freeze document in CDIA, which Joe Gray is the w->owner of. Per the document LSF is valid only on REQTYPE E (Resale), it is w->required in Florida per a PSC mandate effective June 1, 1999. It is w->available in AL, GA, KY, LA, MS, NC and SC effective 3/20/2000. It is not w->required or available in Tennessee per the CDIA document.
w->If you have any additional questions, you will probably want to contact Joe w->at 404-927-2191.
w->I hope this information helps.
w->Thanks!
w->Landra
w->

DSL

Angel

Handwritten initials/signature

P.01

800 365 7943

[REDACTED] Enterprises, Inc.

An Industrial Cleaning Equipment Manufacturer

[REDACTED] Boca Raton, FL 33432

[REDACTED]

www.pressurecleaners.com

APRIL 30, 2001

To FCC

[REDACTED] Enterprises, Inc. is a industrial cleaning equipment manufacturer. We conduct 75% of our business via our internet site [REDACTED]. Our existing customers and potential new customers communicate with us largely via emails, placing orders and requesting information which leads to a large part of our sales.

On Thursday, April 19th, we realized after 5:00pm that we had lost our Bellsouth DSL connection, and consequently, lost our connection to the internet, our website, and our emails. We assumed we were experiencing a problem in the telephone line or even possibly Bellsouth's DSL inhouse equipment such as the Caymen Router.

We contacted Bellsouth by telephone Friday morning for technical assistance. Bellsouth took us through their first level of technical support which is to disconnect the DSL line and the power source to the Caymen router and then reconnect the two. This we did at their request several time. Then, Bellsouth took us through their second level of technical support which included shutting down our entire computer network and isolating one computer to check the dial up connections.

(Our Caymen router has four potential lights that are lit up).

1. Power source
2. Line connection
3. DSL
4. Status

We realized that the power light and line light stayed on continuously and the DSL light and status light would light up briefly, turn off (which is normal), and would remain unlit. Usually, the status light and or the DSL/status are suppose to relight and one remains lit letting us know our connection is ok.

We tried several times throughout the morning with Bellsouth technical assistance to solve the problem over the telephone by simply following their directions in disconnecting and reconnecting the router, reviewing our dial up information and so on.

We think they realized that when the router box lights were not lit properly they knew our connection was not there. However, they insisted on sending someone (a Bellsouth subcontractor) out to solve our problem on site Monday, April 23rd at 2:00pm.

At this point, we had already lost potential revenues of over \$ 3,000 for Bellsouth's efforts to interrupt our DSL connection. We did explain in detail the our business was largely dependent on our connection to the internet and email service. We did request that they come Friday afternoon and explained that we were losing a tremendous amount of our business for the day, but they said Monday at 2:00pm was the earliest they could send someone over to repair the problem.

Their subcontractor came around 2:00pm on Monday and spent about 45 minutes trying to resolve what he thought might be an equipment problem.. When their subcontractor realized it was not an equipment problem, he then began to work with a Bellsouth "line " customer service agent to test our line 561-394-0091. After about an hour, Bellsouth told

him the line was fine, but that our DSL line had been cut on Thursday afternoon the week before intentionally by Bellsouth.

Why was it cut? Due to the fact that our local telephone service provider was no longer Bellsouth and had been switched to IDS months in advance. Bellsouth's method of taking our business back was to make us 100% dependent on them. They are fully aware that DSL service is primarily used by companies that depend largely on the internet.

Rather than use these strong arm tactics, we felt Bellsouth could have simply contacted us and requested that they preferred our local service be with them and we would have complied. Instead, they simply cut our business DSL line, interrupted our internet and email service and now basically had control of our business.

We immediately made the decision that unless we complied with what ever Bellsouth wanted, we would be out of business. At this point, we did request that our 561-394-0091 number (or DSL line)'s local provider service be transferred immediately back to Bellsouth, so that we could then reconnect DSL service.

The transfer was initiated with Bellsouth employee Bonny O' Hare (800-625-8879 x 54211). Our conversation began with Bonny asking us how many lines we had. We told her we had a few and that we only wanted to switch our DSL line's local telephone service back to Bellsouth. She continued to try to convince us to switch each of our five telephone line's local service to Bellsouth, but we insisted that she only switch our DSL number or the 561-394-0091 number so that we could get our DSL line up and working. Again, we told her that we were losing over \$ 3000 + per day without our DSL connection. She then put us on hold for 20 minutes and came back on the line stating that she is faxing to us a "customer authorization form" to give Bellsouth permission to change our current local exchange provider from IDS to Bellsouth.

She did not realize we were also in communication with Fern Miller, our representative at IDS on another line. While we were on hold for 20 minutes with Bellsouth, IDS received

a call requesting that all of our telephone line's local exchange provider service be switched to Bellsouth. We told Ms. Miller that we only requested the one line be changed and that she is instructed to absolutely not give any other lines to Bellsouth. We then signed Bellsouth's "Customer Authorization Form" that gave them permission to take back our 561-394-0091 number.

As of Friday, April 26th, we finally had the DSL line in Bellsouth's hands. At this point, we have lost 7 days of 24/7 business via our email and the internet. We can not believe we are pleading with Bellsouth and explaining that our business relies largely on our DSL connection and that they are reacting without any concern or speak.

We contacted Bellsouth April 27th (Friday) in the morning to request that our DSL line be reconnected through a Bellsouth employee named Michelle 1-800-945-6500 x 54412. We also requested that LDS be our long distance company. Michele took our order and said we should have our DSL service by 7:00pm Friday, April 27th, 2001. Because we had lost such a tremendous amount of business at this point, we called Bellsouth's internet line again and spoke to Angie Glover 1-888-321-2375 x 54233

We shared our story with Angie hoping she would have some sympathy and speed up our DSL connection. She then put us on hold. She too came back and stated that our order would be completed today as per her computer screen and that we would have our DSL service by that evening.

We called to check on the status of our DSL line later that afternoon and spoke with a Denise who told us we would have to re register and start all over again getting our DSL connected.

We thought Denise did not know what she was doing so we called back and got Valerie Bishop 888-321-2375 in customer service in Tennessee. We told her every detail of our ordeal and she was nice enough to call the "telephone line" division of Bellsouth to

FROM :

TO :

PHONE NO. : 4873658521

Jun. 27 2001 09:14PM P5

P.05

check to make sure everything was ok with regard to our 561-394-0091 DSL line and that our order to reconnect our DSL service was in order.

Valerie came back from putting us on hold and said all was ok with our telephone line and that since we already had a Cayman Router and all the equipment necessary, that our Bellsouth DSL service would be working by 7:00pm April 27, 2001.

Monday morning 11:00, April 30, 2001

We arrived at our offices on Monday ready to finally get back to business as usual. We realized immediately that we did not have our DSL connection.

We contacted Bellsouth's internet 1-888-321-2375 "Fast Action" ha ha division to understand why we still were not open for business and to inquire about the status of our order.

We are now talking with a Bellsouth employee named Chris who will not provide us with a last name, a location, or an extension.

After being on hold for 5 minutes here, 10 minutes there, 15 minutes here... Chris states that we now have to start the whole registration process all over again - and he then puts us on hold again and again.

Chris comes back on the line to let me know that Bellsouth probably set everything up on their side by Friday at 7:00 pm, April 27th. Now, Bellsouth needs to send someone to our site to reconfigure our router. Appointment is finally set for May 1, between 1:00 - 2:00 .. Our DSL was up and running as of May 8th, 2001.

[REDACTED]
Owner

[REDACTED] Enterprises, Inc.
[REDACTED]

305 913 4036
Bundy



Customer Authorization Form

Date: April 23
 Account (561) [Redacted]
 Number: [Redacted]
 Account Name: Mau [Redacted]

red cards for BB

Person Authorizing the Change:

Name: [Redacted]
 Title: Owner

List all telephone numbers (circuit numbers, if applicable) for which the change is requested:

INs	Circuit IDs	INs	Circuit IDs
[Redacted]			

(A) I hereby request that the telephone/circuit number(s) listed above remain with **BellSouth** and to cancel any pending orders changing my local service provider to any company other than **BellSouth** effective: _____

Signature: _____

(B) I hereby request that the telephone/circuit number(s) listed above be changed from my current local exchange provider, _____ to BellSouth effective _____.

Docket No. 010740-TP
Exhibit _____ (KK-22)
Page 6 of 9

DSC

Angel Leiro

From: Manuel Marti
Sent: Wednesday, July 11, 2001 2:28 PM
To: Angel Leiro

ACCT#POC075UP
[REDACTED]
[REDACTED]

CUSTOMER HAS HAD ADSL WITH BELL FOR OVER A YEAR ALSO HAS HAD THE LINE WITH IDS FOR LOCAL [REDACTED] RECENTLY ADSL STOPPED OPERATING AND A BELL FAST ACCESS TECH CAME OUT AND EXPLAINED THAT THE ONLY WAY TO HAVE IT FIXED IS TO RELEASE THE LINE TO BELLSOUTH. I HAVE DONE ADSL INSTALLATION FOR BELLSOUTH AND I KNOW THAT THERE SHOULD BE NO PROBLEM WITH HAVING IDS FOR LOCAL DIAL TONE AND BELLSOUTH FOR ADSL. SEEMS TO ME THAT THEY ARE USING THAT EXCUSE TO PICK UP THIS CUSTOMER'S SERVICE. PLEASE LOOK INTO THIS , THANK YOU.

THANKS AGAIN,
MANNY MARTE
EXT. 4172
CUSTOMER SERVICE

Docket No. 010740-TP
Exhibit _____ (KK-22)
Page 7 of 9

PSC ?

Angel Leiro

From: Marilyn D Nichols
 Sent: Tuesday, July 17, 2001 10:18 AM
 To: Angel Leiro
 Subject: FW: Frank Comer wants to file a formal PSC complaint

Importance: High
 Sensitivity: Confidential

-----Original Message-----

From: Marilyn D Nichols
 Sent: Monday, July 09, 2001 11:18 AM
 To: Gilberto Leon
 Subject: Frank Comer wants to file a formal PSC complaint
 Importance: High
 Sensitivity: Confidential

This customer has had a bad connection since he switched to IDS. He told me they took him down for three days and told him he was no longer their customer and they didn't do IDS's work. I advised customer they do the work because it is their equipment. He told me they (Bell South) admitted to that later but by then he was out of service. He told me this took his alarm system down as well and he had been robbed of over \$100,000 worth of stock. He admitted that he felt Bell did that to make him switch back. He said ever since they brought his lines back up he can't hear his customers whether it's long distance or a mile down the street and there is static and an echo on the line. He said they have had 3 or 4 Bell tech's out there and he feels "it's a bunch of hooley".

ATSI - ATSI

Auto

F1 Help ATS Customer Maintenance Program ENTER to edit

Customer # CRS115UP Group # Type SIC Code Exempt

Name Phone USF

Contact Fax FED

Street Sales 1 ST

City Sales 2 CO

Zip code Sales 3 CI

PALEATKA State REPORTS

92177

LEC Bill Fixed charges 0700 Tax Geo 1210753875 ACC ANI

Detail Sep Other Charges 0000 In Out City TOD DOM

Pull Start Finance 0000 TPV 0257654 MIL NPA

Disk Type DiscountTbl 0000 SOC INT

Detail CHG/Housg Min 0000

Late Letter Employee Disc 0000

Comment # 2

Client/Server

F2 Add F4 Search F6 Files F8 Maintenance

F3 Delete F5 Change order F7 Reports F9C Exit

Docket No. 010740-TP
 Exhibit _____ (KK-22)
 Page 8 of 9

tro test INSERT

Record 28678 on screen

I-D-S Long Distance Trouble Ticket
CSR: UTS ARTIAS Ext# [Redacted] Ticket# 51842

Account# CRS1451P-RINL Status [Redacted]

Account Name [Redacted]

Contact [Redacted] Date 07/05/01

Contact Tel [Redacted] Time 15:37:25

Srv Type ANI Rpt'd by JAMTAL TRGC

Traffic Type [Redacted]

Trouble CSIMR CLD REP THAT HAS TERRIBLE STATIC AND NOIC AND ECHO SOU
NDS ON LINES AND ? CHKD LENS W/IDS LOCA

[Redacted]

Date & Time of Call: 07/05/01 09:38:00 Originating #: 3869281687

Terminating Domestic: [Redacted] City: [Redacted]

Terminating Int'l: 011 [Redacted]

F4ENDHELP ESCEXIT F2SAVE SH-F1TABLE F3VIEW F8MODIFY F9OBE F10MULTI >>

tro test INSERT

Record 28678 updated

Record 28678 on screen

Comments: 7/5/01 SPOKE [Redacted] ADVS CLEARING TIME ELTD
7/9/01-SPK TO [Redacted] @ 10:33 ADVISED BELL TOOK HIM DWN
FOR 3 DAYS SAYING HE WAS NO LONGER A BELL CUS & THEY DON'T D
O OUR WRK ADVISED CUS THEIR EQUIP SHLD HV BEEN A SEAMLESS CH
NG DVR WNTS TO FILE A FCC COMPLAINT- HE FEELS BELL DID IT TO

Tech Notes:

MAKE HIM SWITCH BACK-MDN
7/5/01-TESTED LINES-MARGE CAL DISP OUT REPAIR TIME BY 5PM TO
MORROW ELTD

Current TG: [Redacted] Carrier: [Redacted] Ticket: [Redacted]
2nd TG: [Redacted] Carrier: [Redacted] Ticket# [Redacted]
Temp Route: [Redacted] Resolution: / / Return: / / RA Guide: [Redacted]

Resolution: 7/9/01-SPK TO [Redacted] @ 10:13 STILL HV ECHO & HARD TO HEAR OT
HER PARTY-OPENED TT W/SAM @ BS REPAIR TIME BY 6PM 7/10/01-MN

F4ENDHELP ESCEXIT F2SAVE SH-F1TABLE F3VIEW F8MODIFY F9OBE F10MULTI

March 2, 2001

Via E- Mail

Mr. Rick Moses, Chief
Bureau of Consumer Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Fl 32399

Re: **IDS Loss Report 10/23/00-2/21/01**

Dear Mr. Moses

Pursuant to our previous conversation, attached hereto is a list of 633 customers that IDS has tape-recorded authorizations for from the period 10/23/00 to 2/21/01. All listed customers were obtained through one of IDS' telemarketing agencies, Equal Access, Inc. The contact there is David Allen Drew and his telephone number is (407) 831-6798.

These customers switched back to BellSouth Telecommunications in varying time frames after the date of the original switch to IDS. My experience after speaking with several complainants has been that BellSouth does not attempt to obtain a subsequent Letter of Authorization or tape-recorded authorization from customers in order to switch them back to BellSouth. They simply ignore the competing carriers authorizations and switch the customer back at will.

I cannot be absolutely sure that some of the customers listed in the attached document have not been won back through proper methods however, based upon my experience and that of several individuals at IDS who have intimate knowledge regarding the procedures in this regard, I feel reasonably confident that the attached list is a good example of a practice that IDS feels occurs on a regular basis.

If you have any questions, I may be reached directly at (305) 612-4311.

Thank you for attention to this matter.

Sincerely,

Angel M. Leiro
Regulatory Affairs

Cc: Keith Kramer, Sr. V-P

LossDt	Lines	IDSActive	IDSdisco	IDSName	IDSAddr	IDSPho	EqAcc_TPV
10/23/00	2	10/16/00	12/20/00	GLADES	345 N US	561-99	9633
10/23/00	5	10/16/00	12/14/00	MAIL BO	8084 N DA	850-47	9549
10/23/00	1	9/22/00	12/14/00	BIRD FEE	2279 S RID	904-76	7521
10/23/00	2	9/21/00	10/23/00	EYEWEA	800 N FAIR	850-45	5296
10/23/00	1	9/15/00	10/23/00	C J'S AU	1404 LAKE	321-63	4263
10/23/00	1	10/10/00	10/23/00	ATLANTI	675 90TH	561-77	3964
10/23/00	1	8/24/00	10/23/00	WILLIAM	1444 W BL	561-58	3435
10/24/00	1	10/12/00	12/15/00	ERIKSEN	14642 69T	561-62	9215
10/24/00	1	10/10/00	1/15/01	ACCURA	190 HUBER	561-59	8498
10/24/00	1	10/4/00	12/28/00	SEIDO K	17030 S DI	305-25	8340
10/24/00	6	10/9/00	1/5/01	SULLIVA	2471 PORT	561-84	8295
10/24/00	2	9/14/00	12/14/00	CHOICE I	1314 NEPT	561-73	7157
10/25/00	3	10/18/00	11/16/00	BENKO C	701 SOLA	321-79	9712
10/25/00	2	10/17/00	12/5/00	JOE NEU	1205 LAKE	561-54	9648
10/25/00	1	10/11/00	10/25/00	GARDEN	200 FAIRM	407-32	9489
10/25/00	2	10/11/00	12/18/00	SOUTH F	4181 NW 1	561-39	8450
10/25/00	5	10/6/00	10/25/00	STOUGH	802 E MO	904-58	8390
10/25/00	1	10/3/00	12/20/00	GROUP I	777 NW 72	305-26	8082
10/25/00	1	9/22/00	11/8/00	DAYTON	1633 RIDG	904-67	7599
10/25/00	1	8/17/00	11/20/00	RUSTY'S	10561 159	561-74	3587
10/25/00	2	10/24/00	1/19/01	PENSAC	109 SOUT	850-45	10204
10/26/00	3	11/7/00	10/26/00	CONKLIN	8966 BELV	561-79	9826
10/26/00	1	10/24/00	12/23/00	HOGLE'S	13815 NW	352-33	9684
10/26/00	1	10/19/00	10/26/00	ARK PRO	804 LARK	850-98	8831
10/26/00	1	10/10/00	12/18/00	ARROW	10158 LEX	561-73	8825
10/26/00	1	9/15/00	11/8/00	DODGE P	9400 DEES	561-46	7116
10/26/00	2	10/24/00	1/15/01	TOUR G	1892 ABBE	561-43	6369
10/26/00	2	9/6/00	10/26/00	SPIRITU	4300 10TH	561-96	6358
10/26/00	1	10/19/00	12/20/00	R.C.J CR	18038 SW	954-70	5899
10/26/00	8	9/27/00	10/11/00	EAGLE C	1368 N. KI	561-86	4888
10/26/00	1	8/26/00	1/9/01	BATTER	13830-B N	305-68	4146
10/26/00	6	9/6/00	10/26/00	LITTLE C	100 LITTLE	561-27	3368
10/26/00	6	8/29/00	12/11/00	BARE BO	4817 SE DI	561-28	2633
10/26/00	2	10/26/00	12/19/00	NEW YO	1427 KAS	352-68	10053
10/27/00	2	10/18/00	1/16/01	GLORIA'	3415 OKEE	561-48	9693
10/27/00	3	10/13/00	11/20/00	AZAR A	3534 BEAC	904-34	9041
10/27/00	4	10/16/00	11/7/00	A ABLE L	14463 S. D	305-25	8646
10/27/00	17	10/6/00	12/5/00	CINWIN	3101 N FE	954-56	8145
10/27/00	1	10/17/00	10/27/00	SECURIT	5300 NW 7	954-42	6980
10/27/00	1	10/24/00	12/4/00	A SPRIN	1132 PRO	407-86	6743
10/27/00	3	9/9/00	11/21/00	PALM CI	3483 SW P	561-28	6185
10/27/00	6	9/8/00	10/27/00	TOTAL E	501 W INT	904-25	6027
10/27/00	4	9/6/00	10/27/00	LOWER	3122 FLAG	305-29	3978
10/27/00	2	10/24/00	12/5/00	DRAGON	6708 STIR	954-89	3841
10/27/00	4	8/30/00	12/30/00	ORMON	1137 NOV	904-67	3655
10/27/00	2	9/8/00	10/31/00	CASTRO'	421 SE MO	561-28	2654
10/27/00	1	10/24/00	10/27/00	SHAKLEE	661 SE PO	561-87	10225
10/30/00	4	10/9/00	10/30/00	DENVER'	2425 PINE	321-24	8854

10/30/00	2	9/21/00	12/18/00	COCKRE	5651 PENS	850-47	73632
10/30/00	3	9/25/00	10/30/00	HILTON I	9750 W S	954-34	5518
10/31/00	1	10/23/00	10/31/00	JACK YO	333 BARKE	850-47	9756
10/31/00	11	10/18/00	1/19/01	DAVIE A	2080 S UN	954-23	8057
10/31/00	10	9/13/00	1/11/01	TOTAL F	3650 COR	954-75	6379
10/31/00	10	9/14/00	10/31/00	INTELLIN	1990 W NE	321-72	5139
10/31/00	1	8/29/00	10/31/00	CAPTIVE	3272 SE A	561-78	2635
11/1/00	2	10/6/00	11/1/00	RON DA	RT 6 BOX	904-75	8670
11/1/00	5	10/24/00	11/1/00	TRAVEL	100 WEST	305-88	8159
11/1/00	3	10/26/00	11/1/00	US EXPR	2240 NW 8	305-59	4610
11/1/00	1	9/5/00	12/26/00	A 1 WET	(UNIT OUT	305-66	3927
11/1/00	2	10/25/00	12/20/00	HOWAR	1315 GAN	904-76	10700
11/2/00	2	10/25/00	10/20/00	KINGS B	2508 AVE	561-46	9916
11/2/00	4	10/30/00	11/2/00	CHAN'S	1036 DUN	904-75	9794
11/2/00	7	10/23/00	1/19/01	FEARNLE	1203 N DI	561-58	9721
11/2/00	1	10/16/00	11/2/00	DENNY'S	1311 PAL	561-36	9354
11/2/00	1	10/5/00	11/2/00	CARIBBE	2013 SW 3	954-98	8653
11/2/00	1	10/9/00	11/2/00	KING BE	262 E 7TH	561-92	8574
11/2/00	2	9/21/00	12/20/00	CENTRA	280 WALN	904-67	7388
11/2/00	1	10/23/00	11/2/00	SHELTO	606 ALAB	850-62	5451
11/2/00	2	10/30/00	12/26/00	V G TEX	413 OAK P	904-78	11192
11/2/00	1	10/26/00	11/2/00	RUTH'S	1607 FOST	850-78	10978
11/3/00	8	10/13/00	11/3/00	INTERNA	5102 N DA	850-48	9781
11/3/00	1	10/31/00	12/26/00	JUPITER	947 ALETE	561-74	9730
11/3/00	6	10/23/00	11/3/00	ST JAME	3201 CLIN	561-24	8032
11/3/00	6	10/26/00	11/3/00	DONADI	2125 WIN	561-23	7479
11/3/00	6	9/5/00	1/3/01	ULTIMIS	81888 OVE	305-66	5537
11/3/00	4	9/8/00	11/3/00	MELTING	10374 W S	954-75	5375
11/3/00	1	9/6/00	11/3/00	CUT AB	4211 MARI	352-68	4537
11/3/00	2	9/13/00	12/19/00	SARA'S	1652 TAYL	904-78	3463
11/3/00	3	10/25/00	1/15/01	PROFESS	11260 FOR	561-79	10326
11/3/00	6	11/22/00	11/3/00	OVERST	3736 N PA	850-43	10208
11/6/00	3	10/17/00	12/14/00	HAIR CO	1450 NOR	321-45	9392
11/6/00	2	10/11/00	1/17/01	FEE FOR	615 A1 A	904-27	8904
11/6/00	2	9/7/00	11/6/00	CORAL S	9201 W S	954-75	6030
11/6/00	1	9/28/00	11/6/00	FANTAS	218 CENTR	904-27	5561
11/6/00	1	10/26/00	12/21/00	J & M A	2800 S NO	904-76	10613
11/7/00	1	10/10/00	11/7/00	BULLSEY	953 17TH	561-56	9082
11/7/00	1	10/18/00	12/5/00	A C SPR	5525 FAN	321-63	8671
11/7/00	4	10/23/00	1/9/01	SPENCER	31 HOFFM	850-93	8552
11/7/00	1	10/23/00	1/8/01	PARK AV	602 PARK	850-62	6061
11/7/00	3	8/25/00	12/27/00	LEAD;TH	83 WASHI	904-82	3828
11/7/00	2	10/26/00	12/18/00	FLAGAL	2020 WAT	850-23	10056
11/8/00	2	10/24/00	12/26/00	MARIO'S	2007 S. FE	561-73	9845
11/8/00	1	10/25/00	12/14/00	PAWS F	3372 LAKE	561-64	9836
11/8/00	3	10/18/00	12/5/00	INTERMA	3326 MAR	305-77	9495
11/8/00	5	10/24/00	11/8/00	GLOBAL	3333 S CO	561-27	9463
11/8/00	7	10/12/00	12/26/00	SERVPR	2121 SW 5	954-96	8566
11/8/00	2	10/5/00	1/15/01	SOUTHE	7865 SOU	904-82	8356

11/8/00	4	9/29/00	11/8/00	GOLDTE	2225 NW 9	305-59	8134
11/8/00	1	9/22/00	12/1/00	CLOWN	6551 NW 5	954-97	7631
11/8/00	1	9/13/00	11/8/00	AUTO IN	510 S DIXI	954-78	6002
11/8/00	3	9/19/00	1/17/01	RAY CRA	550 E NINE	850-47	1684
11/8/00	3	9/26/00	11/8/00	RUSTY'S	10000 SIN	850-49	1590
11/8/00	1	11/6/00	11/8/00	AMAZIN	3651 NW 6	954-42	12078
11/8/00	1	11/6/00	11/8/00	ADVICE I	1716 KAT	561-54	11686
11/8/00	1	10/31/00	12/4/00	RUDA'S	535 ATLA	904-24	10962
11/8/00	1	10/30/00	11/8/00	PARKER'	825 W PAR	904-42	10430
11/8/00	1	10/24/00	12/14/00	GRIM LA	854 GOLD	407-57	10098
11/9/00	2	10/9/00	1/18/01	BRUNO'S	217 NE 3R	561-73	9096
11/9/00	2	10/23/00	12/19/00	MIAMI N	403 E HAL	954-45	8842
11/9/00	2	10/3/00	12/5/00	ALL BRIT	405 6TH S	904-25	8783
11/9/00	4	10/12/00	12/27/00	AFTER I	2709 FORE	352-68	8728
11/9/00	1	10/9/00	1/2/01	AFFORD	2372 GAL	352-68	8704
11/9/00	2	10/16/00	11/9/00	KWIK ST	5961 FARR	954-98	8629
11/9/00	1	10/11/00	1/23/01	ELEGAN	1500 W C	954-97	8559
11/9/00	3	9/14/00	11/9/00	COUCO	915 LAKE	561-58	7159
11/9/00	5	11/2/00	1/2/01	YMCA O	3145 FLAG	305-29	6864
11/9/00	1	9/12/00	12/4/00	PHILLIPS	3210 E BU	850-78	6445
11/9/00	1	10/19/00	1/2/01	PALMLA	2523 PEPP	561-77	6207
11/9/00	1	8/29/00	12/20/00	KIDS R 4	1607 LUC	904-28	5306
11/9/00	2	10/30/00	12/23/00	ISLAND	507 DUVA	305-29	4970
11/9/00	7	9/7/00	2/14/01	FAIRWA	100 FAIRW	904-28	4592
11/9/00	2	10/10/00	1/22/01	SMITH &	1975 WELL	904-27	2068
11/9/00	3	9/27/00	12/5/00	BASIC	410 JENKS	850-78	1683
11/10/00	1	10/17/00	1/8/01	GANO F	2880 S ME	407-32	9556
11/10/00	1	10/12/00	11/10/00	VICTORI	3864 SE DI	561-22	9083
11/10/00	1	10/6/00	11/10/00	DOMEST	4022 SW S	561-28	9080
11/10/00	1	10/10/00	1/26/01	CUTTING	9200 NAV	850-93	8958
11/10/00	3	10/9/00	11/21/00	SOUTH F	1122 N FL	305-24	8439
11/10/00	3	10/5/00	11/10/00	SPENCER	6588 HWY	850-62	8371
11/10/00	2	10/6/00	11/10/00	SULLIVA	290 BAY S	904-42	8334
11/10/00	3	10/5/00	12/26/00	SPECIAL	602 S MAI	352-33	8243
11/10/00	2	9/27/00	11/10/00	SCHWAR	1824 W HI	954-42	8047
11/10/00	1	9/25/00	11/20/00	DENA'S	220 DUVA	305-29	7661
11/10/00	2	9/26/00	11/11/00	D J'S PO	6412 OLEA	561-59	7576
11/10/00	3	9/14/00	1/8/01	AQUARI	9487 SW 1	305-23	6795
11/10/00	2	10/2/00	1/3/01	PELLETIE	723 BAYW	407-32	6160
11/10/00	1	9/5/00	1/2/00	JOE ROT	594 W LIG	352-48	5567
11/10/00	3	8/7/00	11/10/00	KINDER-	2000 TONI	850-47	1970
11/10/00	2	10/30/00	11/10/00	THE VILL	5215 SW 9	352-38	11220
11/10/00	1	10/31/00	1/10/01	EXPERT	183 JOG R	561-47	10928
11/10/00	3	10/30/00	1/12/01	MEIER S	658 W IND	561-74	10142
11/10/00	2	10/24/00	11/8/00	PERFECT	4404 NW 1	352-37	10110
11/13/00	2	10/24/00	12/20/00	KEVINS	3791 BEAR	407-32	9946
11/13/00	2	10/17/00	12/14/00	HAMM'S	3202 N PA	850-43	9768
11/13/00	10	10/24/00	12/26/00	PRODUC	13040 SW	305-25	9711
11/13/00	1	10/16/00	11/13/00	INTERIO	708 COMM	561-74	9561

11/13/00	1	10/17/00	12/28/00	BENAMI	5243 HAR	561-96	9349
11/13/00	1	10/12/00	11/13/00	DORINA'	6665 BOY	561-37	9314
11/13/00	1	9/5/00	12/29/00	PARK RO	1771 S PA	954-98	6123
11/13/00	1	9/12/00	1/22/01	BRUNSW	1001 N FE	954-45	4216
11/13/00	4	9/5/00	11/13/00	WALKER	2446 SE F	561-22	4148
11/13/00	5	8/1/00	11/13/00	SMART F	1515 N. FE	561-39	2156
11/14/00	2	10/12/00	12/20/00	JUPITER	708 COMM	561-74	9187
11/14/00	13	10/19/00	11/14/00	BARTON	8910 MIRA	305-23	8841
11/14/00	2	10/6/00	11/14/00	DEPUTY	701 N MO	904-32	7609
11/14/00	3	9/25/00	11/14/00	PSYCHIC	2775 BRO	561-84	6567
11/14/00	1	9/8/00	12/4/00	DIXON E	1590 DUN	904-75	5861
11/14/00	2	9/21/00	11/14/00	GREAT L	421 NORT	561-84	4918
11/14/00	1	10/18/00	1/16/01	MOSQUI	360 N US	904-34	3423
11/14/00	1	8/26/00	12/4/00	GINPRO I	401 PINEC	561-74	2683
11/14/00	1	11/13/00	11/14/00	AMERIC	611 S. FED	561-28	2657
11/14/00	2	11/2/00	11/14/00	VISION C	1610 TENN	850-26	11369
11/14/00	1	10/27/00	11/14/00	TIPS & T	254 BART	321-63	11054
11/14/00	2	10/31/00	1/18/01	T M S TR	6712 BALN	904-57	11049
11/14/00	1	10/23/00	1/22/01	MIKE'S C	2600 SILV	904-32	10283
11/14/00	1	11/14/00	12/20/00	KEN'S EL	15733 TE	561-79	10125
11/15/00	4	10/30/00	12/14/00	K-24 INC	1801 NE 2	352-37	9971
11/15/00	1	10/17/00	11/15/00	JERK CIT	8007 S US	561-87	9580
11/15/00	3	10/10/00	12/21/00	MOBIL Q	18190 S DI	305-25	8928
11/15/00	1	10/30/00	12/28/00	ARTHUR	12263 PLE	561-74	7195
11/15/00	4	10/10/00	12/14/00	COOL BR	801 PEAC	321-63	4470
11/15/00	1	11/7/00	1/5/01	ANNUNZ	6350 SUG	561-75	11974
11/15/00	1	11/8/00	11/15/00	A A A A	4506 45TH	561-56	11562
11/15/00	3	10/31/00	12/20/00	MUFFLE	1060 S ST	954-96	10532
11/16/00	1	10/19/00	12/19/00	BRUCE K	207 INLET	904-42	9812
11/16/00	1	10/11/00	11/16/00	DEBONA	1525 NE 8	352-33	9296
11/16/00	2	10/9/00	1/17/01	ASIAN M	5891 S MI	561-43	9011
11/16/00	1	10/11/00	11/16/00	BARBERI	1307 S BA	321-72	8855
11/16/00	1	10/16/00	12/20/00	ONE CAB	1720 NW 2	954-96	8568
11/16/00	1	10/10/00	12/21/00	JAMA M	730 S DEE	954-72	8526
11/16/00	1	10/4/00	12/26/00	SANDLE	700 E AIRP	407-32	8377
11/16/00	1	9/27/00	1/18/01	GUAY PR	730 S DEE	954-42	8036
11/16/00	8	11/2/00	1/24/01	ACT US	1672 W HI	321-72	11637
11/16/00	2	11/8/00	11/16/00	BURN AC	685 SOUT	904-81	11372
11/16/00	1	10/23/00	11/16/00	OAK HIL	351 N U S	904-34	10341
11/17/00	4	10/23/00	11/17/00	HEATON	5805 SAUF	850-45	9910
11/17/00	1	10/23/00	1/3/01	DEAN'S	955 MASA	850-43	9609
11/17/00	8	11/14/00	12/27/00	SWISS	101 S STA	954-98	8618
11/17/00	2	9/21/00	11/17/00	ANTIQU	6370 U S 1	904-82	7651
11/17/00	1	9/21/00	12/4/00	DENTAL	1300 N FE	561-53	7237
11/17/00	2	9/6/00	1/9/01	PALM BE	3038 EVA	561-43	6171
11/17/00	1	11/14/00	1/24/01	ATLANTI	721 SW 6T	954-45	12244
11/17/00	1	11/7/00	12/26/00	WESLEY	1955 BRO	904-75	11762
11/17/00	1	10/30/00	12/4/00	WATER	309 NE 5T	561-27	11226
11/17/00	2	11/3/00	11/17/00	ROCKY	2692 PINE	321-25	11113

11/18/00	1	9/9/00	11/18/00	CHANEY	16961 SW	305-24	6771
11/20/00	1	11/9/00	1/9/01	GOT IT	2141 PALO	850-93	9587
11/20/00	4	11/6/00	12/19/00	HODOR	240 NW 76	352-33	9401
11/20/00	9	11/14/00	1/17/01	U C I PAI	1320 NW 2	954-58	7605
11/20/00	2	9/9/00	11/6/00	PW HEA	PO BOX 16	321-63	6105
11/20/00	3	8/31/00	11/20/00	CITY BAI	P. O. BOX	954-92	4042
11/20/00	1	11/6/00	11/20/00	WORLD	1 JHON AN	904-67	11358
11/20/00	2	11/9/00	11/20/00	ROYAL G	797 NE DI	561-33	11114
11/20/00	1	11/9/00	11/20/00	TM NAIL	1691 FORU	561-71	11060
11/21/00	2	10/26/00	12/21/00	BALZAN	9041 SOU	904-51	9737
11/21/00	1	10/27/00	12/20/00	GULF CO	6014 SEW	850-47	9534
11/21/00	5	11/20/00	11/21/00	A*B*S G	2225 STAT	904-46	9182
11/21/00	3	10/16/00	11/21/00	FLORIDA	330 WALK	904-67	8742
11/21/00	17	9/13/00	12/27/00	HEALTH	1975 OLD	904-82	5368
11/21/00	1	9/5/00	11/21/00	C & D EX	1755 HARL	321-25	4271
11/21/00	2	9/6/00	12/26/00	KENDAL	451 RICHA	321-63	3878
11/21/00	1	8/7/00	11/21/00	NAILERY	2250 S NO	904-30	1813
11/21/00	1	11/7/00	11/21/00	MORNIN	13413 GR	904-75	10552
11/21/00	1	10/30/00	11/21/00	HOME M	3432 N M	352-33	10493
11/22/00	1	10/24/00	1/2/01	FANTAS	325 CORO	850-23	9223
11/22/00	2	11/20/00	11/22/00	FINE LIN	3700 S HO	321-26	9164
11/22/00	1	10/10/00	11/22/00	BEACHSI	242 RIVER	904-67	8872
11/22/00	1	11/21/00	11/22/00	FEEDIN'	8430 COU	904-94	8677
11/22/00	2	10/27/00	12/19/00	LEE'S DI	7387 STAT	352-47	3530
11/22/00	12	9/26/00	12/28/00	GUARDI	841 PRUDE	904-39	1867
11/22/00	2	11/10/00	12/27/00	ALL SEA	5016 AVE	904-82	12344
11/24/00	3	10/23/00	11/30/00	JACKSO	6299 POW	904-73	9854
11/24/00	1	11/14/00	11/24/00	CREIGHT	214 SW RI	561-33	9793
11/24/00	1	9/6/00	12/4/00	JACKS	1073 SW 1	561-34	5250
11/24/00	1	9/1/00	11/21/00	FOSTER	3601 BOU	561-54	5129
11/24/00	3	9/12/00	11/24/00	ISLAND	1417 SADL	904-26	1971
11/24/00	3	11/16/00	12/29/00	BUSY TR	262 E MER	321-45	12460
11/24/00	1	11/16/00	11/24/00	BRIDGET	818 W UNI	352-33	12387
11/24/00	2	10/27/00	11/24/00	PROGRE	1515 CYPR	561-74	10130
11/27/00	1	10/13/00	12/20/00	JOSEPH'	6723 S FE	561-46	9508
11/27/00	1	10/23/00	1/16/01	CARTER	5736 FALC	850-62	8990
11/27/00	12	10/23/00	11/27/00	BONDED	2201 NW	561-99	8172
11/27/00	1	9/22/00	11/27/00	YANKEE	5392 10TH	561-43	7124
11/27/00	2	9/9/00	11/28/00	REEL TIM	3402 NW 7	352-37	6434
11/28/00	2	11/17/00	11/28/00	TOTAL E	9000 SHER	954-70	8692
11/28/00	2	10/5/00	1/26/01	NINJA J	2554 UNIV	954-79	8468
11/28/00	3	10/11/00	12/19/00	P E S ME	10 HIGH P	305-85	6048
11/28/00	1	10/10/00	12/14/00	COMPU	1879 W NE	321-72	4471
11/28/00	5	11/22/00	12/26/00	TEAM S	11474 W C	904-26	12821
11/29/00	4	10/24/00	11/29/00	LINKS A	10000 SW	352-33	10035
11/30/00	1	11/30/00	11/30/00	BILL AN	2207 PRAI	561-96	9036
11/30/00	1	8/1/00	11/21/00	RYDER T	700 N MA	904-75	1480
11/30/00	1	11/17/00	11/27/00	CASPER'	5601 NOR	850-43	12596
11/30/00	3	11/16/00	11/30/00	PALM BE	175 TONN	561-74	11768

11/30/00	5	11/7/00	12/29/00	PARSON	2520 STAT	904-82	10753
11/30/00	1	10/26/00	1/8/01	GUS'S W	60 SUNSE	321-72	10037
11/30/00	1	10/24/00	11/30/00	PAPILLO	6710 N AT	321-86	10024
12/1/00	1	10/20/00	12/11/00	TOP TO	2704 HILL	850-94	6405
12/1/00	1	9/19/00	12/1/00	TOMMY	1103 W 15	850-78	6313
12/1/00	1	9/7/00	12/4/00	CAGLE'S	5615 OLEA	561-46	2585
12/1/00	3	8/8/00	12/18/00	SHEILA B	4400 BAY	850-47	1693
12/1/00	1	11/9/00	11/30/00	ADAMS	11 S DIXIE	904-82	11648
12/1/00	1	10/31/00	12/1/00	PEOPLE'	1328 UNIV	904-74	11368
12/1/00	1	11/9/00	12/1/00	TIGHT C	1217 SOU	321-26	11279
12/4/00	4	11/1/00	12/4/00	PRESTIG	5001 S U	561-46	9901
12/4/00	7	10/26/00	12/4/00	ZACHAR	6550 N WI	321-25	9166
12/4/00	2	9/21/00	12/26/00	CREATIV	101 RIO D	904-47	7462
12/4/00	3	9/7/00	12/14/00	MUNDO	1600 NW B	561-39	2871
12/5/00	1	10/12/00	12/5/00	HENRY &	15 BOLAN	850-46	9739
12/5/00	2	10/19/00	12/14/00	RAM'S A	2100 PAL	321-72	9286
12/5/00	4	12/1/00	12/18/00	DAYTON	862 TERRA	904-25	4215
12/5/00	1	9/8/00	12/5/00	SLOAN'S	826 EASTP	904-75	3874
12/5/00	1	8/7/00	1/3/01	PALM C	4996 PAL	904-44	2004
12/6/00	1	10/31/00	12/20/00	LITTLEFI	3923 LAKE	561-64	9838
12/6/00	4	10/30/00	1/8/01	JAMEST	3331 SUM	850-43	9783
12/6/00	2	10/19/00	12/6/00	CLEAN A	1141 HOLL	561-24	2134
12/6/00	3	11/13/00	12/6/00	BOCA D	89 NW 8T	561-36	12427
12/6/00	2	11/15/00	12/6/00	ABSOLU	3554 NW 9	352-33	12172
12/6/00	1	11/7/00	12/6/00	MANCIN	5717 SW 7	352-37	10000
12/7/00	3	10/20/00	12/7/00	SPECIAL	2171 E OLI	850-47	8343
12/7/00	2	10/26/00	12/8/00	ACTION	8743 FORT	850-62	7265
12/7/00	1	8/25/00	12/27/00	MAMA D	109 BREVA	321-63	4252
12/7/00	1	11/3/00	12/7/00	TIMELES	90 S DIXIE	904-82	11099
12/8/00	2	10/13/00	12/8/00	INSTALA	3800 S US	561-48	9729
12/8/00	2	11/13/00	1/3/01	A BERNA	P O BOX 9	305-24	9602
12/8/00	2	10/12/00	12/8/00	BUDDIES	11440 HY	352-68	8985
12/8/00	1	10/25/00	12/4/00	SHENAN	1759 TOM	904-25	8233
12/8/00	9	11/9/00	12/8/00	ALL AME	1010 STAT	904-46	12116
12/8/00	8	12/28/00	12/8/00	PONTE V	250 A1A N	904-28	10268
12/8/00	6	10/26/00	12/8/00	CABINET	3475 SW P	561-22	10080
12/11/00	4	9/27/00	12/11/00	AMKO A	8087 MON	561-86	7668
12/12/00	1	11/13/00	12/12/00	MICA TE	5937 RAVE	954-98	9767
12/12/00	2	10/11/00	12/12/00	SPRING	3475 DELT	352-68	8455
12/12/00	1	8/30/00	12/12/00	FOUNTAI	3165 N AT	321-78	5072
12/12/00	1	8/24/00	1/12/01	KAST DE	7364 W. A	954-97	4233
12/12/00	4	8/29/00	12/12/00	APPROV	840 35TH	561-56	3758
12/12/00	9	8/29/00	12/12/00	CMC INT	8948 NW 2	305-59	2770
12/13/00	1	10/17/00	1/18/01	I & E ST	3110 F ST	850-76	9554
12/13/00	2	11/2/00	12/13/00	LAKE PA	5651 COR	561-64	9550
12/13/00	1	10/12/00	12/13/00	ACADEM	4112 OKEE	561-46	7153
12/13/00	2	12/8/00	12/19/00	MCCLEL	201 S 5TH	502-34	10517
12/14/00	1	10/13/00	12/14/00	DE PALM	12226 W U	352-33	9300
12/14/00	2	10/5/00	1/9/01	SOUTH F	409 SE 6T	561-27	8593

12/14/00	5	10/18/00	1/9/01	STRAND	5881 COM	850-98	8383
12/14/00	3	9/21/00	1/17/01	CARNLE	7412 SHO	352-59	7618
12/14/00	2	10/17/00	1/17/01	RICHARD	909 BEVILL	904-76	6431
12/14/00	2	10/30/00	12/14/00	CEDAR K	P.O. BOX 1	352-54	4292
12/14/00	2	11/17/00	1/17/01	WAGNER	3434 ATLA	904-39	12113
12/15/00	1	10/16/00	12/15/00	GEORGE	3913 MET	561-46	9483
12/15/00	3	9/26/00	12/27/00	TOM'S PI	2249 W HI	954-42	8012
12/15/00	2	9/21/00	12/20/00	LION & E	2401 N FE	561-44	4054
12/15/00	1	11/14/00	12/15/00	BREVAR	1419 CLEA	321-63	12383
12/15/00	3	11/6/00	12/15/00	EMILE PE	3571 FOX	321-26	11700
12/15/00	1	10/23/00	12/18/00	LTR REN	13724 SW	305-25	10040
12/16/00	1	11/9/00	12/16/00	ANDERS	2820 WOO	850-78	11925
12/17/00	2	11/6/00	12/17/00	RICK LE	909 PINEA	904-78	1124
12/18/00	1	10/16/00	12/18/00	DESIGN	3050 SE M	561-28	9275
12/18/00	1	10/23/00	12/18/00	D & L CE	1232 BLAN	904-27	9236
12/18/00	1	9/15/00	12/18/00	ARCHIE	1740 INDI	561-58	7126
12/18/00	1	10/17/00	12/18/00	KEY WES	419 GREEN	305-29	3832
12/18/00	1	11/14/00	12/18/00	BONDS F	2851 DAVI	321-63	12330
12/18/00	4	11/7/00	1/19/01	AMERIC	1260 CLEA	321-98	11843
12/19/00	3	10/23/00	1/15/01	MC* DO	112 FRENC	407-33	9920
12/19/00	1	10/13/00	12/19/00	BOB'S L	151 WILD	904-42	9807
12/20/00	1	10/23/00	12/20/00	KWANZA	1717 S U	561-46	9989
12/20/00	4	12/14/00	12/26/00	COMMU	199 PIKE R	561-79	9100
12/20/00	1	12/11/00	12/20/00	COUNTR	777 DELTO	407-86	9018
12/20/00	1	10/3/00	1/23/01	DAYTON	2201 W IN	904-23	8627
12/20/00	1	11/22/00	1/3/01	ALTERAT	1129 SW	561-78	12052
12/20/00	1	11/8/00	1/18/01	ANGLER'	10786 SW	305-23	11926
12/21/00	2	10/9/00	12/21/00	CORAL K	209 BILBA	561-79	9095
12/21/00	1	10/17/00	1/11/01	STEVE C	1592 PARK	904-26	8944
12/21/00	1	10/17/00	12/21/00	STYLES I	1478 AUR	321-25	8293
12/21/00	1	11/13/00	12/21/00	ALL APP	1573 SE C	561-33	12008
12/21/00	2	11/8/00	12/21/00	CLEVELA	314 ANGLE	561-46	11823
12/21/00	1	10/24/00	12/19/00	CARL FR	9793 SW 1	305-75	11424
12/22/00	3	10/31/00	12/22/00	ANIMAL	354 HIGH	904-32	7303
12/22/00	1	9/13/00	1/19/01	A & J TV	8201 PITT	850-47	6714
12/22/00	1	9/13/00	1/17/01	PRECISIO	7155 SPRI	352-68	6163
12/22/00	3	12/11/00	12/22/00	RYDER T	1185 EAST	850-76	1534
12/22/00	18	11/21/00	12/22/00	HEMATO	1717 NOR	850-44	12570
12/22/00	2	11/13/00	12/22/00	BRADY'S	323 SE PO	561-78	12431
12/22/00	5	11/1/00	1/11/01	WING KE	309 N MA	407-32	11377
12/22/00	2	11/20/00	12/22/00	RAY-MA	P O BOX 5	407-86	11144
12/26/00	12	9/25/00	12/26/00	PAT'S K	4320 NW 2	352-37	7754
12/26/00	1	8/1/00	12/26/00	NEILSON	131 LEGEN	850-23	1608
12/26/00	1	8/30/00	12/26/00	SKOOTE	3223 E BU	850-76	1530
12/26/00	3	12/23/00	12/26/00	VISION	12200 SW	305-25	14788
12/26/00	1	12/21/00	12/26/00	MARTAS	925 N COU	321-45	13983
12/27/00	1	10/27/00	12/27/00	CARRIBB	6610 PEM	954-89	7650
12/27/00	2	10/20/00	12/27/00	SEVILLA	12133 SW	305-23	6247
12/27/00	2	9/29/00		GOLDEN	2003 FLET	954-92	5548

12/27/00	5	8/26/00	1/8/01	SOURCE	4071 L B	407-48	3494
12/27/00	1	8/30/00	12/27/00	SKOOTE	2937 HYD	850-76	1530
12/27/00	3	12/21/00	12/27/00	CLASSIC	7205 WAE	321-25	13706
12/28/00	1	10/24/00	12/28/00	LINCOLN	953 QUEE	321-26	9986
12/28/00	2	10/16/00	12/28/00	GYROS K	103400 O	305-45	9435
12/28/00	1	10/25/00	12/28/00	BUCKLA	2870 SEMI	904-28	8349
12/28/00	1	12/21/00	12/28/00	D'S AUT	1181 AUR	321-25	14762
12/28/00	1	12/20/00	12/28/00	THOMPS	4320 CREI	850-47	13833
12/28/00	2	9/11/00	12/28/00	KINDERL	2401 NW 9	305-47	1133
12/28/00	6	11/3/00	1/2/01	REGENC	10536 ATL	904-64	10670
12/28/00	2	10/26/00	1/3/01	LANDMA	P.O. BOX 1	321-72	10013
12/29/00	1	10/19/00	12/29/00	SUN'S G	813 GOLF	904-92	8264
12/29/00	2	12/20/00	12/29/00	MARINA	3537 HALI	904-76	7260
12/29/00	1	11/7/00	12/29/00	KERN PH	514 ATLA	561-58	6378
12/29/00	3	1/8/01	12/29/00	PHOENIX	2122 FUNS	954-92	6107
12/29/00	1	8/30/00	1/19/01	PALMER	6510 BEAC	904-72	6083
12/29/00	3	11/15/00	12/29/00	EDCAT E	733 N BEA	904-25	5398
12/29/00	7	9/12/00	12/29/00	PRO 1 B	526 SW PT	561-33	4259
12/29/00	1	9/27/00	12/29/00	ASPHAL	3328 HOLT	850-94	1719
12/29/00	2	12/27/00	1/25/01	B & B AU	2233 HIGH	850-76	14749
12/29/00	1	11/9/00	12/29/00	THE ROC	25225 MA	305-74	11112
1/2/01	2	12/18/00	1/2/01	NANCY	3813 NE B	561-22	9867
1/2/01	2	10/13/00	1/15/01	JIM SEA	60 E MERR	321-45	9388
1/2/01	8	10/25/00	1/2/01	PULMON	1100 E OC	561-28	8366
1/2/01	7	9/25/00	1/2/01	WEBCAS	123 NW 13	561-39	8054
1/2/01	8	11/2/00	1/2/01	CENTUR	855 21ST	561-56	3220
1/2/01	1	12/29/00	1/2/01	COMPLE	1001 NE 1	954-94	13868
1/2/01	4	11/13/00	1/2/01	SAFEGU	1001 WES	561-84	11678
1/2/01	4	10/31/00	1/2/01	TREASU	710 N 39T	561-46	10976
1/2/01	5	11/2/00	1/2/01	TROPIC	2740 US H	904-79	10835
1/2/01	3	11/10/00	1/2/01	PETROLE	325 COMM	850-45	10186
1/3/01	1	10/19/00	12/20/00	HULIHAN	1930 BEAC	904-27	9627
1/3/01	1	11/7/00	1/3/01	HAIR CO	175 S U S	407-66	9452
1/3/01	1	9/6/00	1/3/01	PENINSU	2920 POM	321-72	6055
1/3/01	1	10/19/00	1/22/01	ELITE; L	321 LOLLY	904-28	4885
1/4/01	2	9/27/00	1/4/01	LA NOPA	8818 ATLA	904-72	6403
1/4/01	2	9/27/00	1/4/01	BIG TOP	8436 AMB	904-77	3498
1/4/01	1	8/21/00	1/4/01	KIDSTUF	2037 ANA	904-76	1671
1/4/01	2	12/23/00	1/4/01	THE COZ	1352 13 A	561-56	14384
1/4/01	2	11/8/00	1/4/01	PACE DR	4025 PACE	850-99	12302
1/4/01	2	11/8/00	1/4/01	ACME C	163 PARK	321-72	11877
1/4/01	2	11/6/00	1/4/01	MARY KI	3547 WES	904-69	10502
1/5/01	1	10/23/00	1/5/01	EARLE'S	2140 SECO	305-86	6477
1/5/01	3	1/4/01	1/5/01	DIMENSI	7522 WILE	954-34	14120
1/5/01	7	11/9/00	1/5/01	KEY'S T	4680 OVE	305-74	12031
1/5/01	1	11/3/00	12/26/00	WATTS	256 STATE	904-23	11236
1/6/01	1	12/26/00	1/6/01	DOCKSID	P.O.BOX 2	561-78	14240
1/6/01	4	12/26/00	1/6/01	HOUSIN	PO BOX 56	321-50	12382
1/6/01	1	12/20/00	1/6/01	RIVERSI	1421 PINE	904-38	10660

1/7/01	1	12/21/00	1/7/01	CLASSY	4409 W HI	954-57	13735
1/8/01	5	11/17/00	1/17/01	WILLIAM	1012 W 11	850-76	9760
1/8/01	1	12/15/00	1/8/01	JACK'S	2310 TOM	904-25	9576
1/8/01	2	10/17/00	1/8/01	J'EM OR	6595 MORI	561-49	9496
1/8/01	6	10/9/00	1/11/01	KEY WES	6471 3RD	305-29	6211
1/8/01	2	9/21/00	1/8/01	ST JOHN	706 COMM	561-74	3682
1/8/01	2	8/1/00	1/8/01	TEACHE	490 STATE	904-82	2010
1/8/01	1	1/4/01	1/8/01	BARBAR	9131 GULF	850-45	14282
1/8/01	4	12/21/00	1/8/01	COMMU	1190 N ST	904-73	13795
1/8/01	1	10/31/00	1/8/01	VM IRON	3538 SW	561-78	11237
1/8/01	2	11/6/00	1/24/01	MAID BE	2917 NE 1	352-37	10478
1/9/01	1	10/17/00	1/9/01	H B DEN	13 CENTER	850-93	9771
1/9/01	1	8/1/00	1/9/01	ANCHOR	909 N HIG	904-43	1588
1/9/01	3	11/14/00	1/25/01	BONNET	5309 HOO	561-62	12381
1/10/01	26	10/26/00	2/12/01	CENTUR	13300 SW	954-43	9872
1/10/01	1	12/30/00	1/10/01	ATAMAN	1681 ALPH	321-25	7528
1/10/01	1	1/5/01	1/10/01	THE CLA	13 SW OS	561-21	6835
1/10/01	2	12/7/00	1/10/01	EMERGE	3850 NW 2	561-39	6733
1/10/01	1	9/21/00	1/10/01	FINER H	2241 N 61	954-96	4408
1/10/01	2	10/31/00	1/10/01	HOME S	5209 OKEE	561-46	3142
1/10/01	1	1/8/01	1/10/01	DONE RI	200 DALE	904-45	14117
1/10/01	1	1/2/01	1/10/01	CONCH	57 COMAR	904-82	13802
1/11/01	1	10/20/00	1/11/01	KIRSCH I	14830 SMI	561-63	9598
1/11/01	2	11/20/00	1/11/01	HEALTH	65 ROYAL	561-56	9490
1/11/01	18	9/9/00	1/11/01	STARK C	1855 GRIF	954-92	5592
1/11/01	1	11/22/00	1/11/01	ARLINGT	6320 ARLI	904-74	12165
1/11/01	2	10/24/00	1/11/01	THE MA	3950 PINE	561-43	10116
1/12/01	1	10/17/00	1/12/01	HAIR PL	1201 E 11	850-87	9628
1/12/01	3	10/19/00	1/12/01	BLUEBER	14973 S DI	305-23	9362
1/12/01	4	9/14/00	1/12/01	ACAPUL	32 S BLUE	850-45	7164
1/12/01	1	8/15/00	1/12/01	BALLET	563 BLAN	904-27	3625
1/12/01	2	12/27/00	1/12/01	J MARTI	16805 SW	305-23	14810
1/12/01	2	12/20/00	1/25/01	CREATIV	6287 NW 1	954-96	13968
1/12/01	1	12/20/00	12/21/00	TRIPLE C	1734 SE P	561-39	13965
1/12/01	2	11/7/00	2/13/01	ACCURA	605 SOUT	561-46	11647
1/12/01	2	10/30/00	1/12/01	RICK'S T	1780 W BE	904-63	10702
1/13/01	1	12/30/00	1/13/01	LAKESID	70 N HOM	305-24	14654
1/15/01	2	10/17/00	1/15/01	A B C A	14680 BET	305-25	9585
1/15/01	3	10/10/00	1/15/01	SYSTEM	1817 SW S	561-34	8445
1/15/01	2	12/13/00	1/2/01	TOOTH F	3885 INVE	561-84	8184
1/15/01	2	9/22/00	1/17/01	ZIELFELD	685 E HILL	954-48	7606
1/15/01	2	11/14/00	1/15/01	TREASU	312 BIG TR	904-78	6396
1/15/01	2	1/2/01	1/15/01	JEAN IS	8537 W M	954-72	5417
1/15/01	2	1/2/01	1/15/01	DUKE TH	1807 S UN	904-72	14246
1/15/01	1	12/20/00	1/15/01	NATE CR	12807 SPI	561-79	13975
1/15/01	1	12/20/00	1/15/01	CLASSIC	P O BOX 3	561-69	13960
1/15/01	2	10/31/00	1/15/01	R N R PO	1432 SE H	561-33	10731
1/16/01	1	10/4/00	1/16/01	UNLIMIT	1592 NE S	561-33	8163
1/16/01	2	9/22/00	1/16/01	AMERIC	725 SE PO	561-87	7230

1/16/01	1	12/28/00	1/16/01	RED'S K	6687 VENT	850-62	5703
1/16/01	4	8/29/00	1/16/01	TROPIC	8 S J ST. -	561-58	4820
1/16/01	1	11/30/00	1/16/01	RALPH'S	106 COMM	561-74	3622
1/16/01	4	9/13/00	1/16/01	AQUAPO	2251 URB	904-38	3447
1/16/01	6	1/2/01	1/16/01	NEW OR	724 UP DU	305-29	15077
1/16/01	1	12/21/00	1/25/01	D J LOR	3707 OLD	321-26	13991
1/16/01	5	12/15/00	1/16/01	CUSTOM	5732 PHILL	904-73	13978
1/16/01	1	1/3/01	1/16/01	THE SAL	123 DONN	407-32	10055
1/17/01	1	10/11/00	1/17/01	ADVANC	138 SW G	561-87	8711
1/17/01	2	10/3/00	1/17/01	SBM TEC	1724 PINE	904-73	8174
1/17/01	2	9/15/00	1/17/01	COLOR-C	500 BARNE	321-63	4442
1/17/01	1	11/15/00	1/17/01	STRESS	2053 US H	561-77	3627
1/17/01	1	1/5/01	1/17/01	KEYS INF	P.O BOX 3	305-45	15117
1/17/01	1	12/22/00	1/17/01	SAFARI	20825 GR	305-23	14754
1/17/01	1	11/4/00	1/17/01	A & Z EX	17075 SW	305-25	11527
1/18/01	2	10/5/00	1/18/01	SPANKY'	3204 E AT	954-78	8190
1/18/01	3	1/22/01	2/15/01	WOODS	3575 NW 1	954-25	6494
1/18/01	1	9/6/00	1/18/01	PANHAN	4336 FLOR	850-99	6454
1/18/01	1	1/16/01	1/18/01	H & S T	8351 OLD	904-78	5439
1/18/01	2	8/29/00	1/18/01	JEFF'S P	1206 NW 7	561-36	5297
1/18/01	1	1/8/01	1/18/01	7TH STR	PO BOX 75	305-28	15083
1/18/01	1	12/21/00	1/18/01	D'ALESS	P O BOX 6	561-83	14066
1/18/01	1	11/22/00	1/15/01	BRITISH	4451 HERS	904-38	12592
1/18/01	1	11/7/00	1/18/01	A*A AD	2803 NW 6	352-37	11654
1/18/01	3	12/12/00	1/18/01	AUTO C	2420 S US	606-57	11542
1/18/01	3	10/24/00	1/18/01	KROME	19772 SW	305-25	10227
1/19/01	1	1/16/01	1/25/01	CLARK I	4170 SON	321-63	13909
1/20/01	1	1/4/01	1/20/01	SANDYS	2102 S RID	904-42	8245
1/22/01	2	12/26/00	1/22/01	DALE R	228 COUN	305-45	7083
1/22/01	10	9/18/00	1/22/01	THE BUT	135 GUS H	321-63	6917
1/22/01	1	1/12/01	1/22/01	TOWNE	1304 N KR	305-24	15342
1/22/01	4	1/10/01	2/12/01	AVANZA	6000 NOR	321-25	15233
1/22/01	1	1/8/01	1/22/01	VALHAL	56243 OCE	305-28	15152
1/22/01	10	12/5/00	1/22/01	CENTUR	14620 PER	850-49	12911
1/22/01	2	11/6/00	1/22/01	MAGIC	3740 GATE	904-76	10568
1/23/01	1	10/13/00	1/23/01	DESTINA	1511 MON	904-39	9303
1/23/01	1	1/15/01	1/23/01	HERBALI	7801 SW 1	305-25	14736
1/23/01	8	11/16/00	1/18/01	OCEANW	12635 N.	904-75	10653
1/23/01	4	10/23/00	1/23/01	MASTER	3021 GULF	850-93	10254
1/23/01	2	10/24/00	1/23/01	MR PET	2319 SE F	561-28	10114
1/24/01	3	11/1/00	1/24/01	ESCAMBI	7733 NOR	850-48	9292
1/24/01	5	1/11/01	1/24/01	THOMAS	223 SUNS	561-65	13715
1/24/01	1	11/3/00	1/24/01	MATHIS	296 FORT	850-93	11321
1/25/01	1	10/24/00	1/25/01	JACK'S	8401 FLOR	561-34	9470
1/25/01	2	10/17/00	1/25/01	ANTHON	1881 SE B	561-33	8784
1/25/01	5	9/25/00	1/25/01	DEALER	8432 JUNI	850-47	7694
1/25/01	1	8/15/00	1/25/01	MAJESTI	137 BAY S	904-24	1676
1/25/01	1	1/8/01	1/25/01	SPLASH	P O BOX 9	305-66	15274
1/25/01	40	11/13/00	12/4/00	ALE HOU	126 CENTE	561-74	12360

1/25/01	1	12/15/00	1/25/01	ASIA NAI	99010 OVE	305-45	12255
1/25/01	4	10/26/00	1/25/01	TLC INS	900 U S HI	561-84	10979
1/26/01	1	1/9/01	1/26/01	OYSTER	65 LEWIS	904-82	6072
1/26/01	2	8/31/00	1/26/01	DIXONS	1109 S SA	407-33	4517
1/26/01	2	9/5/00	1/26/01	SUNSHIN	4220 WES	321-63	4005
1/26/01	1	12/21/00	1/26/01	REDLAN	24856 SW	305-24	14731
1/26/01	3	12/27/00	2/19/01	SOFTHA	4893 HIGH	561-23	14358
1/26/01	7	1/3/01	1/26/01	CITY OF	P O BOX 1	407-66	14097
1/26/01	5	1/24/01	1/26/01	LANDRU	26150 SW	305-24	11591
1/26/01	3	11/10/00	1/26/01	LA RUE'	12705 SHI	904-71	10794
1/29/01	9	10/20/00	1/29/01	VEIN CLI	5150 BELF	904-29	9620
1/29/01	2	9/19/00	1/29/01	DOORW	1070 EME	321-72	6958
1/29/01	1	10/24/00	1/29/01	ISLAND	1343 CLEA	561-58	5363
1/29/01	1	9/5/00	1/29/01	GARRISO	13446 NEV	352-59	5009
1/29/01	2	10/31/00	1/29/01	JT CONS	3918 ROG	904-76	10526
1/30/01	2	10/30/00	1/30/01	PINEHUR	3530 SW 2	352-37	9997
1/30/01	15	10/27/00	1/30/01	PALM BE	2925 10TH	561-43	9833
1/30/01	1	10/23/00	1/30/01	HUNT'S	3918 MOO	407-32	9473
1/30/01	1	10/16/00	2/1/01	ELITE PR	7227 CLIN	561-48	9234
1/30/01	1	10/9/00	1/22/01	AIRPORT	6209 N 9T	850-47	8429
1/30/01	2	10/13/00	1/30/01	PHOENIX	505 BEAC	561-77	6219
1/30/01	2	9/6/00	1/30/01	RUMORS	83 U S HW	407-66	5965
1/30/01	2	8/30/00	1/30/01	GOOD'N	3343 S US	561-46	4931
1/30/01	2	8/29/00	1/30/01	LAURI'S	3866 MEL	561-96	4060
1/30/01	1	9/6/00	1/30/01	CONDRA	1855 OAK	561-79	2581
1/30/01	1	12/29/00	1/30/01	D & L EN	5590 1ST	305-29	14834
1/30/01	1	1/8/01	1/30/01	AVONDA	509 SW 2	954-78	14243
1/30/01	2	11/2/00	2/16/01	QUAINT	1424 MAIT	904-74	10786
1/31/01	2	11/17/00	1/31/01	EAST CO	645 FELLE	561-58	9506
1/31/01	1	10/16/00	1/31/01	ALL PRO	2836 ATLA	561-56	8932
1/31/01	1	10/5/00	1/31/01	SOUTHE	2669 FORE	561-96	8438
1/31/01	3	9/22/00	1/31/01	CORPOR	1101 GULF	850-93	7698
1/31/01	3	8/17/00	1/31/01	CARLISL	6077 HILB	850-44	3076
1/31/01	1	1/8/01	2/16/01	P & L CL	444 NORT	321-25	15346
1/31/01	1	12/29/00	1/31/01	VIDEO S	15884 SW	305-25	14751
2/1/01	2	10/24/00		PRO TEC	1711 N PO	954-98	8898
2/1/01	3	10/2/00	2/1/01	J I MAC	1866 NW 5	954-98	8649
2/1/01	1	9/22/00		CAMELLI	830 N RIVE	954-94	7640
2/1/01	1	9/22/00		ALTERAT	604 S FED	954-42	7624
2/1/01	1	9/9/00	2/19/01	KIDDIE K	2480 S CO	561-96	6469
2/1/01	1	9/6/00		ORMON	1482 W G	904-67	5732
2/1/01	1	9/15/00	1/24/01	WARRIO	1102 N FL	305-24	3596
2/1/01	6	9/27/00		GREAT F	1450 N CO	321-45	3176
2/1/01	1	12/27/00		BUSINES	2455 NE 5	561-58	2659
2/1/01	1	1/24/01		BANDITO	7229 S DE	850-26	16201
2/1/01	5	1/31/01	2/19/01	SHELTER	77 COCOP	305-74	15182
2/1/01	4	1/3/01		DEANS S	1436 B SO	850-96	14391
2/1/01	1	1/30/01		DISCRET	1333 OLD	904-82	14121
2/1/01	2	11/3/00		ACE AUT	6548 MOBI	850-94	11692

2/2/01	3	10/16/00		HYPERIO	895 NE DI	561-22	9468
2/2/01	5	8/29/00		SUZZAN	120 INTER	407-33	4020
2/3/01	1	9/8/00		ECONOM	8520 N PA	850-47	6065
2/4/01	7	9/19/00	1/31/01	LUBE AM	11747 PHI	904-26	2158
2/5/01	1	10/27/00	2/20/01	HAIR EX	1205 PARK	407-32	9699
2/5/01	4	10/31/00		DENVER	1542 KING	904-26	7637
2/5/01	3	9/9/00		ENERGY	600 S. US	904-67	6077
2/5/01	1	8/31/00		GALLION	7260 EXLI	904-77	5133
2/5/01	3	8/29/00	1/31/01	CHERISH	1382 HOW	407-86	4300
2/5/01	1	8/23/00	2/1/01	RUDOLP	603 COLO	561-28	3018
2/5/01	1	9/11/00	12/18/00	CHARLE	109 N 29T	561-46	2597
2/5/01	10	1/18/01		REDISH	2156 PON	561-56	13879
2/5/01	1	10/23/00	2/1/01	PUTTING	10925 SW	305-25	10048
2/6/01	14	10/30/00	11/28/00	ADVENT	106285 O	305-45	8920
2/6/01	1	10/5/00		SUNFLO	8802 US H	561-58	8236
2/6/01	1	10/6/00		SMOOTH	2944 POST	904-38	8218
2/6/01	2	9/9/00		DIVERSIF	10796 S. U	561-33	5447
2/6/01	1	9/1/00		E&E TRA	110 JOAC	850-93	4546
2/6/01	1	8/9/00		NAIL BY	675 KINGS	904-21	2036
2/6/01	1	1/8/01		STAFFO	P O BOX 4	407-64	15304
2/6/01	4	12/14/00		KIDS UNI	2800 W 84	305-55	11624
2/6/01	2	11/6/00	2/5/01	J T'S BA	9037 LEM	904-92	10876
2/7/01	1	10/16/00	2/15/01	HOOK A	6963 W N	321-72	9662
2/7/01	3	12/22/00		DESIGNE	4831 N DI	561-36	14740
2/8/01	2	10/18/00		CHRISM	PO BOX 22	904-43	9803
2/8/01	1	10/25/00		SMITH D	8980 S HO	954-43	8613
2/8/01	2	9/15/00		IRISH CO	3154 VIA P	561-27	5292
2/8/01	1	9/1/00		FLETCH	1950 FLAS	321-72	5034
2/8/01	1	1/4/01		K & K M	27907 CO	305-87	15191
2/8/01	1	11/28/00		ELITE CA	5450 WILS	407-32	10403
2/9/01	1	1/4/01		KEYSTO	175 NE SP	561-39	9896
2/9/01	2	9/14/00		DECORA	4215 NOR	561-62	7050
2/9/01	4	1/10/01	2/2/01	CMH UNI	6561 NOR	305-59	14561
2/9/01	2	10/31/00		WETZEL	131 N 2ND	561-46	11332
2/12/01	2	10/16/00		EAST CO	3921 S US	561-46	9503
2/12/01	1	9/21/00	2/7/01	CHINO A	10720 SW	305-25	7510
2/12/01	1	9/5/00		CUSTOM	314 SE 1S	561-27	4705
2/12/01	2	8/10/00	1/9/01	INDIA G	9825 SAN	904-26	1888
2/12/01	5	1/9/01		ARNOFF	3620 S U	561-46	14548
2/12/01	14	1/11/01		HOMES	610 DELTO	407-86	11144
2/12/01	1	11/8/00		QUACKE	3427 E CO	904-73	10801
2/12/01	2	10/27/00		LIL' CHA	P.O. BOX 2	904-75	10559
2/12/01	3	11/30/00		BEACH	655 PENZA	850-93	10233
2/13/01	1	10/12/00		EUROPE	2441 SE O	561-22	9350
2/13/01	2	12/15/00		CENTER	P O BOX 1	561-96	9324
2/13/01	2	8/29/00		INAFEC	404 NE 2N	561-27	5284
2/13/01	4	9/26/00	2/1/01	SCHUYL	44 SPANIS	904-82	3977
2/14/01	1	10/17/00		SANDY'	889 HUNT	321-98	8846
2/14/01	1	10/5/00		HOYTE'S	3420 N CO	321-45	8417

2/14/01	1	9/26/00		INTELLA	5490 HUD	561-43	7999
2/14/01	3	8/29/00		DYNAMI	1425 GENE	321-25	4960
2/14/01	1	9/6/00		BRACO R	6207 ROY	561-79	4205
2/15/01	3	10/24/00		JOSTEN	1316 BERR	321-24	9398
2/15/01	1	10/16/00		DISTINC	14080 CA	352-68	9329
2/15/01	2	10/9/00		SANTA L	2700 W A	954-97	9148
2/15/01	1	10/6/00		ANYTHIN	1412 NW 4	352-37	8829
2/15/01	1	9/8/00		TUTTLE	9063 SUN	850-93	6343
2/15/01	1	1/17/01		DANCE 1	6779 W. IN	561-57	14040
2/15/01	5	12/5/00	2/20/01	CALDWE	116 N TAR	850-43	12727
2/15/01	1	11/22/00		NATURE'	335 CORR	850-45	12443
2/15/01	16	10/31/00		T M S I	720 S 8TH	904-32	10985
2/16/01	2	10/16/00		BUSBEE	2803 E CE	850-46	9642
2/16/01	2	10/23/00		DALLAS	10416 BIS	904-75	9242
2/16/01	3	10/31/00		BALLYH	152 DOVE	305-85	9039
2/16/01	3	10/9/00	2/14/01	AMERIC	241 FITH A	321-83	8805
2/16/01	1	10/4/00		AMERIC	8285 EAST	850-93	8794
2/16/01	1	12/13/00		AUTO JA	5620 S.W	954-96	7671
2/16/01	1	9/21/00		AMERIC	111 NE NA	561-34	6918
2/16/01	1	9/14/00	12/4/00	CONTEM	4031 NW 9	352-33	6907
2/16/01	2	9/9/00		PALM BE	1122 AVIA	561-79	4415
2/16/01	1	12/26/00		BARLOW	4575 J BA	850-67	14365
2/16/01	1	11/16/00		BURLES	708 W DET	850-47	12462
2/16/01	6	11/16/00		ANGELIA	206 ELM A	407-30	12056
2/16/01	2	11/1/00	2/8/01	ROOF LE	P.O. BOX 1	561-43	11111
2/17/01	3	11/15/00		ASSOCI	13357 OVE	305-45	12275
2/19/01	4	1/10/01		MOODY	7150 HOL	954-43	6488
2/19/01	2	8/10/00		CYCLE S	3423 NOR	850-43	3048
2/19/01	1	12/30/00		FLORIDA	538 W PAL	305-24	14734
2/19/01	1	11/22/00		BOLAND	7198 MAP	352-59	12298
2/19/01	2	11/6/00		PARK VI	6226 S BA	904-73	10399
2/20/01	1	2/3/01		HAMM	928 W WH	850-26	5560
2/20/01	2	8/19/00		RACHAL	8060 HILL	904-73	3677
2/20/01	1	12/23/00		BACK ST	1821 NOR	850-43	14212
2/20/01	1	11/22/00		ALL AME	6235 NW 1	954-96	12745
2/20/01	1	11/24/00		CABINET	989 LAURE	561-84	12524
2/20/01	2	11/14/00		ALBERT	83 N ROSC	904-28	12004
2/20/01	2	11/14/00	2/19/01	AMERIC	7296 42N	561-84	11893
2/20/01	2	10/25/00		A LITTLE	305 ACOR	321-38	10567
2/21/01	1	10/27/00		CLASSIC	3346 ROY	904-22	8927
2/21/01	2	10/9/00		BAYOU B	6186 S CO	561-64	8911
2/21/01	2	9/8/00		EAST CO	1751 COG	321-63	4837
2/21/01	4	1/22/01		PRADO	1022 NW 3	305-63	15682
2/21/01	4	12/26/00		CARIBEA	14375 SW	305-27	12701
2/21/01	2	11/14/00		ANNALE	5681 GRA	850-49	11660

LossDt	Lines	IDSActive	IDSdisco	IDSName	IDSAddr	IDSPho	EqAcc_TPV
10/23/00	2	10/16/00	12/20/00	GLADES	345 N US	561-99	9633
10/23/00	5	10/16/00	12/14/00	MAIL BO	8084 N DA	850-47	9549
10/23/00	1	9/22/00	12/14/00	BIRD FEE	2279 S RID	904-76	7521
10/23/00	2	9/21/00	10/23/00	EYEWEA	800 N FAIR	850-45	5296
10/23/00	1	9/15/00	10/23/00	C J'S AU	1404 LAKE	321-63	4263
10/23/00	1	10/10/00	10/23/00	ATLANTI	675 90TH	561-77	3964
10/23/00	1	8/24/00	10/23/00	WILLIAM	1444 W BL	561-58	3435
10/24/00	1	10/12/00	12/15/00	ERIKSEN	14642 69T	561-62	9215
10/24/00	1	10/10/00	1/15/01	ACCURA	190 HUBER	561-59	8498
10/24/00	1	10/4/00	12/28/00	SEIDO K	17030 S DI	305-25	8340
10/24/00	6	10/9/00	1/5/01	SULLIVA	2471 PORT	561-84	8295
10/24/00	2	9/14/00	12/14/00	CHOICE I	1314 NEPT	561-73	7157
10/25/00	3	10/18/00	11/16/00	BENKO C	701 SOLA	321-79	9712
10/25/00	2	10/17/00	12/5/00	JOE NEU	1205 LAKE	561-54	9648
10/25/00	1	10/11/00	10/25/00	GARDEN	200 FAIRM	407-32	9489
10/25/00	2	10/11/00	12/18/00	SOUTH F	4181 NW 1	561-39	8450
10/25/00	5	10/6/00	10/25/00	STOUGH	802 E MO	904-58	8390
10/25/00	1	10/3/00	12/20/00	GROUP I	777 NW 72	305-26	8082
10/25/00	1	9/22/00	11/8/00	DAYTON	1633 RIDG	904-67	7599
10/25/00	1	8/17/00	11/20/00	RUSTY'S	10561 159	561-74	3587
10/25/00	2	10/24/00	1/19/01	PENSAC	109 SOUT	850-45	10204
10/26/00	3	11/7/00	10/26/00	CONKLIN	8966 BELV	561-79	9826
10/26/00	1	10/24/00	12/23/00	HOGLE'S	13815 NW	352-33	9684
10/26/00	1	10/19/00	10/26/00	ARK PRO	804 LARK	850-98	8831
10/26/00	1	10/10/00	12/18/00	ARROW	10158 LEX	561-73	8825
10/26/00	1	9/15/00	11/8/00	DODGE P	9400 DEES	561-46	7116
10/26/00	2	10/24/00	1/15/01	TOUR G	1892 ABBE	561-43	6369
10/26/00	2	9/6/00	10/26/00	SPIRITU	4300 10TH	561-96	6358
10/26/00	1	10/19/00	12/20/00	R.C.J CR	18038 SW	954-70	5899
10/26/00	8	9/27/00	10/11/00	EAGLE C	1368 N. KI	561-86	4888
10/26/00	1	8/26/00	1/9/01	BATTER	13830-B N	305-68	4146
10/26/00	6	9/6/00	10/26/00	LITTLE C	100 LITTLE	561-27	3368
10/26/00	6	8/29/00	12/11/00	BARE BO	4817 SE DI	561-28	2633
10/26/00	2	10/26/00	12/19/00	NEW YO	1427 KAS	352-68	10053
10/27/00	2	10/18/00	1/16/01	GLORIA'	3415 OKEE	561-48	9693
10/27/00	3	10/13/00	11/20/00	AZAR A	3534 BEAC	904-34	9041
10/27/00	4	10/16/00	11/7/00	A ABLE L	14463 S. D	305-25	8646
10/27/00	17	10/6/00	12/5/00	CINWIN	3101 N FE	954-56	8145
10/27/00	1	10/17/00	10/27/00	SECURIT	5300 NW 7	954-42	6980
10/27/00	1	10/24/00	12/4/00	A SPRIN	1132 PRO	407-86	6743
10/27/00	3	9/9/00	11/21/00	PALM CI	3483 SW P	561-28	6185
10/27/00	6	9/8/00	10/27/00	TOTAL E	501 W INT	904-25	6027
10/27/00	4	9/6/00	10/27/00	LOWER	3122 FLAG	305-29	3978
10/27/00	2	10/24/00	12/5/00	DRAGON	6708 STIR	954-89	3841
10/27/00	4	8/30/00	12/30/00	ORMON	1137 NOV	904-67	3655
10/27/00	2	9/8/00	10/31/00	CASTRO'	421 SE MO	561-28	2654
10/27/00	1	10/24/00	10/27/00	SHAKLEE	661 SE PO	561-87	10225
10/30/00	4	10/9/00	10/30/00	DENVER'	2425 PINE	321-24	8854

10/30/00	2	9/21/00	12/18/00	COCKRE	5651 PENS	850-47	73632
10/30/00	3	9/25/00	10/30/00	HILTON I	9750 W S	954-34	5518
10/31/00	1	10/23/00	10/31/00	JACK YO	333 BARKE	850-47	9756
10/31/00	11	10/18/00	1/19/01	DAVIE A	2080 S UN	954-23	8057
10/31/00	10	9/13/00	1/11/01	TOTAL F	3650 COR	954-75	6379
10/31/00	10	9/14/00	10/31/00	INTELLIN	1990 W NE	321-72	5139
10/31/00	1	8/29/00	10/31/00	CAPTIVE	3272 SE A	561-78	2635
11/1/00	2	10/6/00	11/1/00	RON DA	RT 6 BOX	904-75	8670
11/1/00	5	10/24/00	11/1/00	TRAVEL	100 WEST	305-88	8159
11/1/00	3	10/26/00	11/1/00	US EXPR	2240 NW 8	305-59	4610
11/1/00	1	9/5/00	12/26/00	A 1 WET	(UNIT OUT	305-66	3927
11/1/00	2	10/25/00	12/20/00	HOWAR	1315 GAN	904-76	10700
11/2/00	2	10/25/00	10/20/00	KINGS B	2508 AVE	561-46	9916
11/2/00	4	10/30/00	11/2/00	CHAN'S	1036 DUN	904-75	9794
11/2/00	7	10/23/00	1/19/01	FEARNLE	1203 N DI	561-58	9721
11/2/00	1	10/16/00	11/2/00	DENNY'S	1311 PAL	561-36	9354
11/2/00	1	10/5/00	11/2/00	CARIBBE	2013 SW 3	954-98	8653
11/2/00	1	10/9/00	11/2/00	KING BE	262 E 7TH	561-92	8574
11/2/00	2	9/21/00	12/20/00	CENTRA	280 WALN	904-67	7388
11/2/00	1	10/23/00	11/2/00	SHELTO	606 ALAB	850-62	5451
11/2/00	2	10/30/00	12/26/00	V G TEX	413 OAK P	904-78	11192
11/2/00	1	10/26/00	11/2/00	RUTH'S	1607 FOST	850-78	10978
11/3/00	8	10/13/00	11/3/00	INTERNA	5102 N DA	850-48	9781
11/3/00	1	10/31/00	12/26/00	JUPITER	947 ALETE	561-74	9730
11/3/00	6	10/23/00	11/3/00	ST JAME	3201 CLIN	561-24	8032
11/3/00	6	10/26/00	11/3/00	DONADI	2125 WIN	561-23	7479
11/3/00	6	9/5/00	1/3/01	ULTIMIS	81888 OVE	305-66	5537
11/3/00	4	9/8/00	11/3/00	MELTING	10374 W S	954-75	5375
11/3/00	1	9/6/00	11/3/00	CUT AB	4211 MARI	352-68	4537
11/3/00	2	9/13/00	12/19/00	SARA'S	1652 TAYL	904-78	3463
11/3/00	3	10/25/00	1/15/01	PROFESS	11260 FOR	561-79	10326
11/3/00	6	11/22/00	11/3/00	OVERST	3736 N PA	850-43	10208
11/6/00	3	10/17/00	12/14/00	HAIR CO	1450 NOR	321-45	9392
11/6/00	2	10/11/00	1/17/01	FEE FOR	615 A1 A	904-27	8904
11/6/00	2	9/7/00	11/6/00	CORAL S	9201 W S	954-75	6030
11/6/00	1	9/28/00	11/6/00	FANTAS	218 CENTR	904-27	5561
11/6/00	1	10/26/00	12/21/00	J & M A	2800 S NO	904-76	10613
11/7/00	1	10/10/00	11/7/00	BULLSEY	953 17TH	561-56	9082
11/7/00	1	10/18/00	12/5/00	A C SPR	5525 FAN	321-63	8671
11/7/00	4	10/23/00	1/9/01	SPENCER	31 HOFFM	850-93	8552
11/7/00	1	10/23/00	1/8/01	PARK AV	602 PARK	850-62	6061
11/7/00	3	8/25/00	12/27/00	LEAD;TH	83 WASHI	904-82	3828
11/7/00	2	10/26/00	12/18/00	FLAGAL	2020 WAT	850-23	10056
11/8/00	2	10/24/00	12/26/00	MARIO'S	2007 S. FE	561-73	9845
11/8/00	1	10/25/00	12/14/00	PAWS F	3372 LAKE	561-64	9836
11/8/00	3	10/18/00	12/5/00	INTERMA	3326 MAR	305-77	9495
11/8/00	5	10/24/00	11/8/00	GLOBAL	3333 S CO	561-27	9463
11/8/00	7	10/12/00	12/26/00	SERVPR	2121 SW 5	954-96	8566
11/8/00	2	10/5/00	1/15/01	SOUTHE	7865 SOU	904-82	8356

11/8/00	4	9/29/00	11/8/00	GOLDTE	2225 NW 9	305-59	8134
11/8/00	1	9/22/00	12/1/00	CLOWN	6551 NW 5	954-97	7631
11/8/00	1	9/13/00	11/8/00	AUTO IN	510 S DIXI	954-78	6002
11/8/00	3	9/19/00	1/17/01	RAY CRA	550 E NINE	850-47	1684
11/8/00	3	9/26/00	11/8/00	RUSTY'S	10000 SIN	850-49	1590
11/8/00	1	11/6/00	11/8/00	AMAZIN	3651 NW 6	954-42	12078
11/8/00	1	11/6/00	11/8/00	ADVICE I	1716 KAT	561-54	11686
11/8/00	1	10/31/00	12/4/00	RUDA'S	535 ATLA	904-24	10962
11/8/00	1	10/30/00	11/8/00	PARKER'	825 W PAR	904-42	10430
11/8/00	1	10/24/00	12/14/00	GRIM LA	854 GOLD	407-57	10098
11/9/00	2	10/9/00	1/18/01	BRUNO'S	217 NE 3R	561-73	9096
11/9/00	2	10/23/00	12/19/00	MIAMI N	403 E HAL	954-45	8842
11/9/00	2	10/3/00	12/5/00	ALL BRIT	405 6TH S	904-25	8783
11/9/00	4	10/12/00	12/27/00	AFTER I	2709 FORE	352-68	8728
11/9/00	1	10/9/00	1/2/01	AFFORD	2372 GAL	352-68	8704
11/9/00	2	10/16/00	11/9/00	KWIK ST	5961 FARR	954-98	8629
11/9/00	1	10/11/00	1/23/01	ELEGAN	1500 W C	954-97	8559
11/9/00	3	9/14/00	11/9/00	COUCO	915 LAKE	561-58	7159
11/9/00	5	11/2/00	1/2/01	YMCA O	3145 FLAG	305-29	6864
11/9/00	1	9/12/00	12/4/00	PHILLIPS	3210 E BU	850-78	6445
11/9/00	1	10/19/00	1/2/01	PALMLA	2523 PEPP	561-77	6207
11/9/00	1	8/29/00	12/20/00	KIDS R 4	1607 LUC	904-28	5306
11/9/00	2	10/30/00	12/23/00	ISLAND	507 DUVA	305-29	4970
11/9/00	7	9/7/00	2/14/01	FAIRWA	100 FAIRW	904-28	4592
11/9/00	2	10/10/00	1/22/01	SMITH &	1975 WELL	904-27	2068
11/9/00	3	9/27/00	12/5/00	BASIC	410 JENKS	850-78	1683
11/10/00	1	10/17/00	1/8/01	GANO F	2880 S ME	407-32	9556
11/10/00	1	10/12/00	11/10/00	VICTORI	3864 SE DI	561-22	9083
11/10/00	1	10/6/00	11/10/00	DOMEST	4022 SW S	561-28	9080
11/10/00	1	10/10/00	1/26/01	CUTTING	9200 NAV	850-93	8958
11/10/00	3	10/9/00	11/21/00	SOUTH F	1122 N FL	305-24	8439
11/10/00	3	10/5/00	11/10/00	SPENCER	6588 HWY	850-62	8371
11/10/00	2	10/6/00	11/10/00	SULLIVA	290 BAY S	904-42	8334
11/10/00	3	10/5/00	12/26/00	SPECIAL	602 S MAI	352-33	8243
11/10/00	2	9/27/00	11/10/00	SCHWAR	1824 W HI	954-42	8047
11/10/00	1	9/25/00	11/20/00	DENA'S	220 DUVA	305-29	7661
11/10/00	2	9/26/00	11/11/00	D J'S PO	6412 OLEA	561-59	7576
11/10/00	3	9/14/00	1/8/01	AQUARI	9487 SW 1	305-23	6795
11/10/00	2	10/2/00	1/3/01	PELLETIE	723 BAYW	407-32	6160
11/10/00	1	9/5/00	1/2/00	JOE ROT	594 W LIG	352-48	5567
11/10/00	3	8/7/00	11/10/00	KINDER-	2000 TONI	850-47	1970
11/10/00	2	10/30/00	11/10/00	THE VILL	5215 SW 9	352-38	11220
11/10/00	1	10/31/00	1/10/01	EXPERT	183 JOG R	561-47	10928
11/10/00	3	10/30/00	1/12/01	MEIER S	658 W IND	561-74	10142
11/10/00	2	10/24/00	11/8/00	PERFECT	4404 NW 1	352-37	10110
11/13/00	2	10/24/00	12/20/00	KEVINS	3791 BEAR	407-32	9946
11/13/00	2	10/17/00	12/14/00	HAMM'S	3202 N PA	850-43	9768
11/13/00	10	10/24/00	12/26/00	PRODUC	13040 SW	305-25	9711
11/13/00	1	10/16/00	11/13/00	INTERIO	708 COMM	561-74	9561

11/13/00	1	10/17/00	12/28/00	BENAMI	5243 HAR	561-96	9349
11/13/00	1	10/12/00	11/13/00	DORINA'	6665 BOY	561-37	9314
11/13/00	1	9/5/00	12/29/00	PARK RO	1771 S PA	954-98	6123
11/13/00	1	9/12/00	1/22/01	BRUNSW	1001 N FE	954-45	4216
11/13/00	4	9/5/00	11/13/00	WALKER	2446 SE F	561-22	4148
11/13/00	5	8/1/00	11/13/00	SMART F	1515 N. FE	561-39	2156
11/14/00	2	10/12/00	12/20/00	JUPITER	708 COMM	561-74	9187
11/14/00	13	10/19/00	11/14/00	BARTON	8910 MIRA	305-23	8841
11/14/00	2	10/6/00	11/14/00	DEPUTY	701 N MO	904-32	7609
11/14/00	3	9/25/00	11/14/00	PSYCHIC	2775 BRO	561-84	6567
11/14/00	1	9/8/00	12/4/00	DIXON E	1590 DUN	904-75	5861
11/14/00	2	9/21/00	11/14/00	GREAT L	421 NORT	561-84	4918
11/14/00	1	10/18/00	1/16/01	MOSQUI	360 N US	904-34	3423
11/14/00	1	8/26/00	12/4/00	GINPRO I	401 PINEC	561-74	2683
11/14/00	1	11/13/00	11/14/00	AMERIC	611 S. FED	561-28	2657
11/14/00	2	11/2/00	11/14/00	VISION C	1610 TENN	850-26	11369
11/14/00	1	10/27/00	11/14/00	TIPS & T	254 BART	321-63	11054
11/14/00	2	10/31/00	1/18/01	T M S TR	6712 BALN	904-57	11049
11/14/00	1	10/23/00	1/22/01	MIKE'S C	2600 SILV	904-32	10283
11/14/00	1	11/14/00	12/20/00	KEN'S EL	15733 TE	561-79	10125
11/15/00	4	10/30/00	12/14/00	K-24 INC	1801 NE 2	352-37	9971
11/15/00	1	10/17/00	11/15/00	JERK CIT	8007 S US	561-87	9580
11/15/00	3	10/10/00	12/21/00	MOBIL Q	18190 S DI	305-25	8928
11/15/00	1	10/30/00	12/28/00	ARTHUR	12263 PLE	561-74	7195
11/15/00	4	10/10/00	12/14/00	COOL BR	801 PEAC	321-63	4470
11/15/00	1	11/7/00	1/5/01	ANNUNZ	6350 SUG	561-75	11974
11/15/00	1	11/8/00	11/15/00	A A A A	4506 45TH	561-56	11562
11/15/00	3	10/31/00	12/20/00	MUFFLE	1060 S ST	954-96	10532
11/16/00	1	10/19/00	12/19/00	BRUCE K	207 INLET	904-42	9812
11/16/00	1	10/11/00	11/16/00	DEBONAI	1525 NE 8	352-33	9296
11/16/00	2	10/9/00	1/17/01	ASIAN M	5891 S MI	561-43	9011
11/16/00	1	10/11/00	11/16/00	BARBERI	1307 S BA	321-72	8855
11/16/00	1	10/16/00	12/20/00	ONE CAB	1720 NW 2	954-96	8568
11/16/00	1	10/10/00	12/21/00	JAMA M	730 S DEE	954-72	8526
11/16/00	1	10/4/00	12/26/00	SANDLE	700 E AIRP	407-32	8377
11/16/00	1	9/27/00	1/18/01	GUAY PR	730 S DEE	954-42	8036
11/16/00	8	11/2/00	1/24/01	ACT US	1672 W HI	321-72	11637
11/16/00	2	11/8/00	11/16/00	BURN AC	685 SOUT	904-81	11372
11/16/00	1	10/23/00	11/16/00	OAK HIL	351 N U S	904-34	10341
11/17/00	4	10/23/00	11/17/00	HEATON	5805 SAUF	850-45	9910
11/17/00	1	10/23/00	1/3/01	DEAN'S	955 MASA	850-43	9609
11/17/00	8	11/14/00	12/27/00	SWISS	101 S STA	954-98	8618
11/17/00	2	9/21/00	11/17/00	ANTIQU	6370 U S 1	904-82	7651
11/17/00	1	9/21/00	12/4/00	DENTAL	1300 N FE	561-53	7237
11/17/00	2	9/6/00	1/9/01	PALM BE	3038 EVA	561-43	6171
11/17/00	1	11/14/00	1/24/01	ATLANTI	721 SW 6T	954-45	12244
11/17/00	1	11/7/00	12/26/00	WESLEY	1955 BRO	904-75	11762
11/17/00	1	10/30/00	12/4/00	WATER	309 NE 5T	561-27	11226
11/17/00	2	11/3/00	11/17/00	ROCKY	2692 PINE	321-25	11113

11/18/00	1	9/9/00	11/18/00	CHANEY	16961 SW	305-24	6771
11/20/00	1	11/9/00	1/9/01	GOT IT	2141 PALO	850-93	9587
11/20/00	4	11/6/00	12/19/00	HODOR	240 NW 76	352-33	9401
11/20/00	9	11/14/00	1/17/01	U C I PAI	1320 NW 2	954-58	7605
11/20/00	2	9/9/00	11/6/00	PW HEA	PO BOX 16	321-63	6105
11/20/00	3	8/31/00	11/20/00	CITY BAI	P. O. BOX	954-92	4042
11/20/00	1	11/6/00	11/20/00	WORLD	1 JHON AN	904-67	11358
11/20/00	2	11/9/00	11/20/00	ROYAL G	797 NE DI	561-33	11114
11/20/00	1	11/9/00	11/20/00	TM NAIL	1691 FORU	561-71	11060
11/21/00	2	10/26/00	12/21/00	BALZAN	9041 SOU	904-51	9737
11/21/00	1	10/27/00	12/20/00	GULF CO	6014 SEW	850-47	9534
11/21/00	5	11/20/00	11/21/00	A*B*S G	2225 STAT	904-46	9182
11/21/00	3	10/16/00	11/21/00	FLORIDA	330 WALK	904-67	8742
11/21/00	17	9/13/00	12/27/00	HEALTH	1975 OLD	904-82	5368
11/21/00	1	9/5/00	11/21/00	C & D EX	1755 HARL	321-25	4271
11/21/00	2	9/6/00	12/26/00	KENDAL	451 RICHA	321-63	3878
11/21/00	1	8/7/00	11/21/00	NAILERY	2250 S NO	904-30	1813
11/21/00	1	11/7/00	11/21/00	MORNIN	13413 GR	904-75	10552
11/21/00	1	10/30/00	11/21/00	HOME M	3432 N M	352-33	10493
11/22/00	1	10/24/00	1/2/01	FANTAS	325 CORO	850-23	9223
11/22/00	2	11/20/00	11/22/00	FINE LIN	3700 S HO	321-26	9164
11/22/00	1	10/10/00	11/22/00	BEACHSI	242 RIVER	904-67	8872
11/22/00	1	11/21/00	11/22/00	FEEDIN'	8430 COU	904-94	8677
11/22/00	2	10/27/00	12/19/00	LEE'S DI	7387 STAT	352-47	3530
11/22/00	12	9/26/00	12/28/00	GUARDI	841 PRUDE	904-39	1867
11/22/00	2	11/10/00	12/27/00	ALL SEA	5016 AVE	904-82	12344
11/24/00	3	10/23/00	11/30/00	JACKSO	6299 POW	904-73	9854
11/24/00	1	11/14/00	11/24/00	CREIGHT	214 SW RI	561-33	9793
11/24/00	1	9/6/00	12/4/00	JACKS	1073 SW 1	561-34	5250
11/24/00	1	9/1/00	11/21/00	FOSTER	3601 BOU	561-54	5129
11/24/00	3	9/12/00	11/24/00	ISLAND	1417 SADL	904-26	1971
11/24/00	3	11/16/00	12/29/00	BUSY TR	262 E MER	321-45	12460
11/24/00	1	11/16/00	11/24/00	BRIDGET	818 W UNI	352-33	12387
11/24/00	2	10/27/00	11/24/00	PROGRE	1515 CYPR	561-74	10130
11/27/00	1	10/13/00	12/20/00	JOSEPH'	6723 S FE	561-46	9508
11/27/00	1	10/23/00	1/16/01	CARTER	5736 FALC	850-62	8990
11/27/00	12	10/23/00	11/27/00	BONDED	2201 NW	561-99	8172
11/27/00	1	9/22/00	11/27/00	YANKEE	5392 10TH	561-43	7124
11/27/00	2	9/9/00	11/28/00	REEL TIM	3402 NW 7	352-37	6434
11/28/00	2	11/17/00	11/28/00	TOTAL E	9000 SHER	954-70	8692
11/28/00	2	10/5/00	1/26/01	NINJA J	2554 UNIV	954-79	8468
11/28/00	3	10/11/00	12/19/00	P E S ME	10 HIGH P	305-85	6048
11/28/00	1	10/10/00	12/14/00	COMPU	1879 W NE	321-72	4471
11/28/00	5	11/22/00	12/26/00	TEAM S	11474 W C	904-26	12821
11/29/00	4	10/24/00	11/29/00	LINKS A	10000 SW	352-33	10035
11/30/00	1	11/30/00	11/30/00	BILL AN	2207 PRAI	561-96	9036
11/30/00	1	8/1/00	11/21/00	RYDER T	700 N MA	904-75	1480
11/30/00	1	11/17/00	11/27/00	CASPER'	5601 NOR	850-43	12596
11/30/00	3	11/16/00	11/30/00	PALM BE	175 TONN	561-74	11768

11/30/00	5	11/7/00	12/29/00	PARSON	2520 STAT	904-82	10753
11/30/00	1	10/26/00	1/8/01	GUS'S W	60 SUNSE	321-72	10037
11/30/00	1	10/24/00	11/30/00	PAPILLO	6710 N AT	321-86	10024
12/1/00	1	10/20/00	12/11/00	TOP TO	2704 HILL	850-94	6405
12/1/00	1	9/19/00	12/1/00	TOMMY	1103 W 15	850-78	6313
12/1/00	1	9/7/00	12/4/00	CAGLE'S	5615 OLEA	561-46	2585
12/1/00	3	8/8/00	12/18/00	SHEILA B	4400 BAY	850-47	1693
12/1/00	1	11/9/00	11/30/00	ADAMS	11 S DIXIE	904-82	11648
12/1/00	1	10/31/00	12/1/00	PEOPLE'	1328 UNIV	904-74	11368
12/1/00	1	11/9/00	12/1/00	TIGHT C	1217 SOU	321-26	11279
12/4/00	4	11/1/00	12/4/00	PRESTIG	5001 S U	561-46	9901
12/4/00	7	10/26/00	12/4/00	ZACHAR	6550 N WI	321-25	9166
12/4/00	2	9/21/00	12/26/00	CREATIV	101 RIO D	904-47	7462
12/4/00	3	9/7/00	12/14/00	MUNDO	1600 NW B	561-39	2871
12/5/00	1	10/12/00	12/5/00	HENRY &	15 BOLAN	850-46	9739
12/5/00	2	10/19/00	12/14/00	RAM'S A	2100 PAL	321-72	9286
12/5/00	4	12/1/00	12/18/00	DAYTON	862 TERRA	904-25	4215
12/5/00	1	9/8/00	12/5/00	SLOAN'S	826 EASTP	904-75	3874
12/5/00	1	8/7/00	1/3/01	PALM C	4996 PAL	904-44	2004
12/6/00	1	10/31/00	12/20/00	LITTLEFI	3923 LAKE	561-64	9838
12/6/00	4	10/30/00	1/8/01	JAMEST	3331 SUM	850-43	9783
12/6/00	2	10/19/00	12/6/00	CLEAN A	1141 HOLL	561-24	2134
12/6/00	3	11/13/00	12/6/00	BOCA D	89 NW 8T	561-36	12427
12/6/00	2	11/15/00	12/6/00	ABSOLU	3554 NW 9	352-33	12172
12/6/00	1	11/7/00	12/6/00	MANCIN	5717 SW 7	352-37	10000
12/7/00	3	10/20/00	12/7/00	SPECIAL	2171 E OLI	850-47	8343
12/7/00	2	10/26/00	12/8/00	ACTION	8743 FORT	850-62	7265
12/7/00	1	8/25/00	12/27/00	MAMA D	109 BREVA	321-63	4252
12/7/00	1	11/3/00	12/7/00	TIMELES	90 S DIXIE	904-82	11099
12/8/00	2	10/13/00	12/8/00	INSTALA	3800 S US	561-48	9729
12/8/00	2	11/13/00	1/3/01	A BERNA	P O BOX 9	305-24	9602
12/8/00	2	10/12/00	12/8/00	BUDDIES	11440 HY	352-68	8985
12/8/00	1	10/25/00	12/4/00	SHENAN	1759 TOM	904-25	8233
12/8/00	9	11/9/00	12/8/00	ALL AME	1010 STAT	904-46	12116
12/8/00	8	12/28/00	12/8/00	PONTE V	250 A1A N	904-28	10268
12/8/00	6	10/26/00	12/8/00	CABINET	3475 SW P	561-22	10080
12/11/00	4	9/27/00	12/11/00	AMKO A	8087 MON	561-86	7668
12/12/00	1	11/13/00	12/12/00	MICA TE	5937 RAVE	954-98	9767
12/12/00	2	10/11/00	12/12/00	SPRING	3475 DELT	352-68	8455
12/12/00	1	8/30/00	12/12/00	FOUNTAI	3165 N AT	321-78	5072
12/12/00	1	8/24/00	1/12/01	KAST DE	7364 W. A	954-97	4233
12/12/00	4	8/29/00	12/12/00	APPROV	840 35TH	561-56	3758
12/12/00	9	8/29/00	12/12/00	CMC INT	8948 NW 2	305-59	2770
12/13/00	1	10/17/00	1/18/01	I & E ST	3110 F ST	850-76	9554
12/13/00	2	11/2/00	12/13/00	LAKE PA	5651 COR	561-64	9550
12/13/00	1	10/12/00	12/13/00	ACADEM	4112 OKEE	561-46	7153
12/13/00	2	12/8/00	12/19/00	MCCLLEL	201 S 5TH	502-34	10517
12/14/00	1	10/13/00	12/14/00	DE PALM	12226 W U	352-33	9300
12/14/00	2	10/5/00	1/9/01	SOUTH F	409 SE 6T	561-27	8593

12/14/00	5	10/18/00	1/9/01	STRAND	5881 COM	850-98	8383
12/14/00	3	9/21/00	1/17/01	CARNLE	7412 SHO	352-59	7618
12/14/00	2	10/17/00	1/17/01	RICHARD	909 BEVILL	904-76	6431
12/14/00	2	10/30/00	12/14/00	CEDAR K	P.O. BOX 1	352-54	4292
12/14/00	2	11/17/00	1/17/01	WAGNER	3434 ATLA	904-39	12113
12/15/00	1	10/16/00	12/15/00	GEORGE	3913 MET	561-46	9483
12/15/00	3	9/26/00	12/27/00	TOM'S PI	2249 W HI	954-42	8012
12/15/00	2	9/21/00	12/20/00	LION & E	2401 N FE	561-44	4054
12/15/00	1	11/14/00	12/15/00	BREVAR	1419 CLEA	321-63	12383
12/15/00	3	11/6/00	12/15/00	EMILE PE	3571 FOX	321-26	11700
12/15/00	1	10/23/00	12/18/00	LTR REN	13724 SW	305-25	10040
12/16/00	1	11/9/00	12/16/00	ANDERS	2820 WOO	850-78	11925
12/17/00	2	11/6/00	12/17/00	RICK LE	909 PINEA	904-78	1124
12/18/00	1	10/16/00	12/18/00	DESIGN	3050 SE M	561-28	9275
12/18/00	1	10/23/00	12/18/00	D & L CE	1232 BLAN	904-27	9236
12/18/00	1	9/15/00	12/18/00	ARCHIE	1740 INDI	561-58	7126
12/18/00	1	10/17/00	12/18/00	KEY WES	419 GREEN	305-29	3832
12/18/00	1	11/14/00	12/18/00	BONDS F	2851 DAVI	321-63	12330
12/18/00	4	11/7/00	1/19/01	AMERIC	1260 CLEA	321-98	11843
12/19/00	3	10/23/00	1/15/01	MC* DO	112 FRENC	407-33	9920
12/19/00	1	10/13/00	12/19/00	BOB'S L	151 WILD	904-42	9807
12/20/00	1	10/23/00	12/20/00	KWANZA	1717 S U	561-46	9989
12/20/00	4	12/14/00	12/26/00	COMMU	199 PIKE R	561-79	9100
12/20/00	1	12/11/00	12/20/00	COUNTR	777 DELTO	407-86	9018
12/20/00	1	10/3/00	1/23/01	DAYTON	2201 W IN	904-23	8627
12/20/00	1	11/22/00	1/3/01	ALTERAT	1129 SW	561-78	12052
12/20/00	1	11/8/00	1/18/01	ANGLER'	10786 SW	305-23	11926
12/21/00	2	10/9/00	12/21/00	CORAL K	209 BILBA	561-79	9095
12/21/00	1	10/17/00	1/11/01	STEVE C	1592 PARK	904-26	8944
12/21/00	1	10/17/00	12/21/00	STYLES I	1478 AUR	321-25	8293
12/21/00	1	11/13/00	12/21/00	ALL APP	1573 SE C	561-33	12008
12/21/00	2	11/8/00	12/21/00	CLEVELA	314 ANGLE	561-46	11823
12/21/00	1	10/24/00	12/19/00	CARL FR	9793 SW 1	305-75	11424
12/22/00	3	10/31/00	12/22/00	ANIMAL	354 HIGH	904-32	7303
12/22/00	1	9/13/00	1/19/01	A & J TV	8201 PITT	850-47	6714
12/22/00	1	9/13/00	1/17/01	PRECISIO	7155 SPRI	352-68	6163
12/22/00	3	12/11/00	12/22/00	RYDER T	1185 EAST	850-76	1534
12/22/00	18	11/21/00	12/22/00	HEMATO	1717 NOR	850-44	12570
12/22/00	2	11/13/00	12/22/00	BRADY'S	323 SE PO	561-78	12431
12/22/00	5	11/1/00	1/11/01	WING KE	309 N MA	407-32	11377
12/22/00	2	11/20/00	12/22/00	RAY-MA	P O BOX 5	407-86	11144
12/26/00	12	9/25/00	12/26/00	PAT'S K	4320 NW 2	352-37	7754
12/26/00	1	8/1/00	12/26/00	NEILSON	131 LEGEN	850-23	1608
12/26/00	1	8/30/00	12/26/00	SKOOTE	3223 E BU	850-76	1530
12/26/00	3	12/23/00	12/26/00	VISION	12200 SW	305-25	14788
12/26/00	1	12/21/00	12/26/00	MARTAS	925 N COU	321-45	13983
12/27/00	1	10/27/00	12/27/00	CARRIBB	6610 PEM	954-89	7650
12/27/00	2	10/20/00	12/27/00	SEVILLA	12133 SW	305-23	6247
12/27/00	2	9/29/00		GOLDEN	2003 FLET	954-92	5548

12/27/00	5	8/26/00	1/8/01	SOURCE	4071 L B	407-48	3494
12/27/00	1	8/30/00	12/27/00	SKOOTE	2937 HYD	850-76	1530
12/27/00	3	12/21/00	12/27/00	CLASSIC	7205 WAE	321-25	13706
12/28/00	1	10/24/00	12/28/00	LINCOLN	953 QUEE	321-26	9986
12/28/00	2	10/16/00	12/28/00	GYROS K	103400 O	305-45	9435
12/28/00	1	10/25/00	12/28/00	BUCKLA	2870 SEMI	904-28	8349
12/28/00	1	12/21/00	12/28/00	D'S AUT	1181 AUR	321-25	14762
12/28/00	1	12/20/00	12/28/00	THOMPS	4320 CREI	850-47	13833
12/28/00	2	9/11/00	12/28/00	KINDERL	2401 NW 9	305-47	1133
12/28/00	6	11/3/00	1/2/01	REGENC	10536 ATL	904-64	10670
12/28/00	2	10/26/00	1/3/01	LANDMA	P.O. BOX 1	321-72	10013
12/29/00	1	10/19/00	12/29/00	SUN'S G	813 GOLF	904-92	8264
12/29/00	2	12/20/00	12/29/00	MARINA	3537 HALI	904-76	7260
12/29/00	1	11/7/00	12/29/00	KERN PH	514 ATLA	561-58	6378
12/29/00	3	1/8/01	12/29/00	PHOENIX	2122 FUNS	954-92	6107
12/29/00	1	8/30/00	1/19/01	PALMER	6510 BEAC	904-72	6083
12/29/00	3	11/15/00	12/29/00	EDCAT E	733 N BEA	904-25	5398
12/29/00	7	9/12/00	12/29/00	PRO 1 B	526 SW PT	561-33	4259
12/29/00	1	9/27/00	12/29/00	ASPHAL	3328 HOLT	850-94	1719
12/29/00	2	12/27/00	1/25/01	B & B AU	2233 HIGH	850-76	14749
12/29/00	1	11/9/00	12/29/00	THE ROC	25225 MA	305-74	11112
1/2/01	2	12/18/00	1/2/01	NANCY	3813 NE B	561-22	9867
1/2/01	2	10/13/00	1/15/01	JIM SEA	60 E MERR	321-45	9388
1/2/01	8	10/25/00	1/2/01	PULMON	1100 E OC	561-28	8366
1/2/01	7	9/25/00	1/2/01	WEBCAS	123 NW 13	561-39	8054
1/2/01	8	11/2/00	1/2/01	CENTUR	855 21ST	561-56	3220
1/2/01	1	12/29/00	1/2/01	COMPLE	1001 NE 1	954-94	13868
1/2/01	4	11/13/00	1/2/01	SAFEGU	1001 WES	561-84	11678
1/2/01	4	10/31/00	1/2/01	TREASU	710 N 39T	561-46	10976
1/2/01	5	11/2/00	1/2/01	TROPIC	2740 US H	904-79	10835
1/2/01	3	11/10/00	1/2/01	PETROLE	325 COMM	850-45	10186
1/3/01	1	10/19/00	12/20/00	HULIHAN	1930 BEAC	904-27	9627
1/3/01	1	11/7/00	1/3/01	HAIR CO	175 S U S	407-66	9452
1/3/01	1	9/6/00	1/3/01	PENINSU	2920 POM	321-72	6055
1/3/01	1	10/19/00	1/22/01	ELITE; L	321 LOLLY	904-28	4885
1/4/01	2	9/27/00	1/4/01	LA NOPA	8818 ATLA	904-72	6403
1/4/01	2	9/27/00	1/4/01	BIG TOP	8436 AMB	904-77	3498
1/4/01	1	8/21/00	1/4/01	KIDSTUF	2037 ANA	904-76	1671
1/4/01	2	12/23/00	1/4/01	THE COZ	1352 13 A	561-56	14384
1/4/01	2	11/8/00	1/4/01	PACE DR	4025 PACE	850-99	12302
1/4/01	2	11/8/00	1/4/01	ACME C	163 PARK	321-72	11877
1/4/01	2	11/6/00	1/4/01	MARY KI	3547 WES	904-69	10502
1/5/01	1	10/23/00	1/5/01	EARLE'S	2140 SECO	305-86	6477
1/5/01	3	1/4/01	1/5/01	DIMENSI	7522 WILE	954-34	14120
1/5/01	7	11/9/00	1/5/01	KEY'S T	4680 OVE	305-74	12031
1/5/01	1	11/3/00	12/26/00	WATTS	256 STATE	904-23	11236
1/6/01	1	12/26/00	1/6/01	DOCKSID	P.O. BOX 2	561-78	14240
1/6/01	4	12/26/00	1/6/01	HOUSIN	PO BOX 56	321-50	12382
1/6/01	1	12/20/00	1/6/01	RIVERSI	1421 PINE	904-38	10660

1/7/01	1	12/21/00	1/7/01	CLASSY	4409 W HI	954-57	13735
1/8/01	5	11/17/00	1/17/01	WILLIAM	1012 W 11	850-76	9760
1/8/01	1	12/15/00	1/8/01	JACK'S	2310 TOM	904-25	9576
1/8/01	2	10/17/00	1/8/01	J'EM OR	6595 MORI	561-49	9496
1/8/01	6	10/9/00	1/11/01	KEY WES	6471 3RD	305-29	6211
1/8/01	2	9/21/00	1/8/01	ST JOHN	706 COMM	561-74	3682
1/8/01	2	8/1/00	1/8/01	TEACHE	490 STATE	904-82	2010
1/8/01	1	1/4/01	1/8/01	BARBAR	9131 GULF	850-45	14282
1/8/01	4	12/21/00	1/8/01	COMMU	1190 N ST	904-73	13795
1/8/01	1	10/31/00	1/8/01	VM IRON	3538 SW	561-78	11237
1/8/01	2	11/6/00	1/24/01	MAID BE	2917 NE 1	352-37	10478
1/9/01	1	10/17/00	1/9/01	H B DEN	13 CENTER	850-93	9771
1/9/01	1	8/1/00	1/9/01	ANCHOR	909 N HIG	904-43	1588
1/9/01	3	11/14/00	1/25/01	BONNET	5309 HOO	561-62	12381
1/10/01	26	10/26/00	2/12/01	CENTUR	13300 SW	954-43	9872
1/10/01	1	12/30/00	1/10/01	ATAMAN	1681 ALPH	321-25	7528
1/10/01	1	1/5/01	1/10/01	THE CLA	13 SW OS	561-21	6835
1/10/01	2	12/7/00	1/10/01	EMERGE	3850 NW 2	561-39	6733
1/10/01	1	9/21/00	1/10/01	FINER H	2241 N 61	954-96	4408
1/10/01	2	10/31/00	1/10/01	HOME S	5209 OKEE	561-46	3142
1/10/01	1	1/8/01	1/10/01	DONE RI	200 DALE	904-45	14117
1/10/01	1	1/2/01	1/10/01	CONCH	57 COMAR	904-82	13802
1/11/01	1	10/20/00	1/11/01	KIRSCH I	14830 SMI	561-63	9598
1/11/01	2	11/20/00	1/11/01	HEALTH	65 ROYAL	561-56	9490
1/11/01	18	9/9/00	1/11/01	STARK C	1855 GRIF	954-92	5592
1/11/01	1	11/22/00	1/11/01	ARLINGT	6320 ARLI	904-74	12165
1/11/01	2	10/24/00	1/11/01	THE MA	3950 PINE	561-43	10116
1/12/01	1	10/17/00	1/12/01	HAIR PL	1201 E 11	850-87	9628
1/12/01	3	10/19/00	1/12/01	BLUEBER	14973 S DI	305-23	9362
1/12/01	4	9/14/00	1/12/01	ACAPUL	32 S BLUE	850-45	7164
1/12/01	1	8/15/00	1/12/01	BALLET	563 BLAN	904-27	3625
1/12/01	2	12/27/00	1/12/01	J MARTI	16805 SW	305-23	14810
1/12/01	2	12/20/00	1/25/01	CREATIV	6287 NW 1	954-96	13968
1/12/01	1	12/20/00	12/21/00	TRIPLE C	1734 SE P	561-39	13965
1/12/01	2	11/7/00	2/13/01	ACCURA	605 SOUT	561-46	11647
1/12/01	2	10/30/00	1/12/01	RICK'S T	1780 W BE	904-63	10702
1/13/01	1	12/30/00	1/13/01	LAKESID	70 N HOM	305-24	14654
1/15/01	2	10/17/00	1/15/01	A B C A	14680 BET	305-25	9585
1/15/01	3	10/10/00	1/15/01	SYSTEM	1817 SW S	561-34	8445
1/15/01	2	12/13/00	1/2/01	TOOTH F	3885 INVE	561-84	8184
1/15/01	2	9/22/00	1/17/01	ZIELFELD	685 E HILL	954-48	7606
1/15/01	2	11/14/00	1/15/01	TREASU	312 BIG TR	904-78	6396
1/15/01	2	1/2/01	1/15/01	JEAN IS	8537 W M	954-72	5417
1/15/01	2	1/2/01	1/15/01	DUKE TH	1807 S UN	904-72	14246
1/15/01	1	12/20/00	1/15/01	NATE CR	12807 SPI	561-79	13975
1/15/01	1	12/20/00	1/15/01	CLASSIC	P O BOX 3	561-69	13960
1/15/01	2	10/31/00	1/15/01	R N R PO	1432 SE H	561-33	10731
1/16/01	1	10/4/00	1/16/01	UNLIMIT	1592 NE S	561-33	8163
1/16/01	2	9/22/00	1/16/01	AMERIC	725 SE PO	561-87	7230

1/16/01	1	12/28/00	1/16/01	RED'S K	6687 VENT	850-62	5703
1/16/01	4	8/29/00	1/16/01	TROPIC	8 S J ST. -	561-58	4820
1/16/01	1	11/30/00	1/16/01	RALPH'S	106 COMM	561-74	3622
1/16/01	4	9/13/00	1/16/01	AQUAPO	2251 URB	904-38	3447
1/16/01	6	1/2/01	1/16/01	NEW OR	724 UP DU	305-29	15077
1/16/01	1	12/21/00	1/25/01	D J LOR	3707 OLD	321-26	13991
1/16/01	5	12/15/00	1/16/01	CUSTOM	5732 PHILL	904-73	13978
1/16/01	1	1/3/01	1/16/01	THE SAL	123 DONN	407-32	10055
1/17/01	1	10/11/00	1/17/01	ADVANC	138 SW G	561-87	8711
1/17/01	2	10/3/00	1/17/01	SBM TEC	1724 PINE	904-73	8174
1/17/01	2	9/15/00	1/17/01	COLOR-C	500 BARNE	321-63	4442
1/17/01	1	11/15/00	1/17/01	STRESS	2053 US H	561-77	3627
1/17/01	1	1/5/01	1/17/01	KEYS INF	P.O BOX 3	305-45	15117
1/17/01	1	12/22/00	1/17/01	SAFARI	20825 GR	305-23	14754
1/17/01	1	11/4/00	1/17/01	A & Z EX	17075 SW	305-25	11527
1/18/01	2	10/5/00	1/18/01	SPANKY'	3204 E AT	954-78	8190
1/18/01	3	1/22/01	2/15/01	WOODS	3575 NW 1	954-25	6494
1/18/01	1	9/6/00	1/18/01	PANHAN	4336 FLOR	850-99	6454
1/18/01	1	1/16/01	1/18/01	H & S T	8351 OLD	904-78	5439
1/18/01	2	8/29/00	1/18/01	JEFF'S P	1206 NW 7	561-36	5297
1/18/01	1	1/8/01	1/18/01	7TH STR	PO BOX 75	305-28	15083
1/18/01	1	12/21/00	1/18/01	D'ALESS	P O BOX 6	561-83	14066
1/18/01	1	11/22/00	1/15/01	BRITISH	4451 HERS	904-38	12592
1/18/01	1	11/7/00	1/18/01	A*A AD	2803 NW 6	352-37	11654
1/18/01	3	12/12/00	1/18/01	AUTO C	2420 S US	606-57	11542
1/18/01	3	10/24/00	1/18/01	KROME	19772 SW	305-25	10227
1/19/01	1	1/16/01	1/25/01	CLARK I	4170 SON	321-63	13909
1/20/01	1	1/4/01	1/20/01	SANDYS	2102 S RID	904-42	8245
1/22/01	2	12/26/00	1/22/01	DALE R	228 COUN	305-45	7083
1/22/01	10	9/18/00	1/22/01	THE BUT	135 GUS H	321-63	6917
1/22/01	1	1/12/01	1/22/01	TOWNE	1304 N KR	305-24	15342
1/22/01	4	1/10/01	2/12/01	AVANZA	6000 NOR	321-25	15233
1/22/01	1	1/8/01	1/22/01	VALHAL	56243 OCE	305-28	15152
1/22/01	10	12/5/00	1/22/01	CENTUR	14620 PER	850-49	12911
1/22/01	2	11/6/00	1/22/01	MAGIC	3740 GATE	904-76	10568
1/23/01	1	10/13/00	1/23/01	DESTINA	1511 MON	904-39	9303
1/23/01	1	1/15/01	1/23/01	HERBALI	7801 SW 1	305-25	14736
1/23/01	8	11/16/00	1/18/01	OCEANW	12635 N.	904-75	10653
1/23/01	4	10/23/00	1/23/01	MASTER	3021 GULF	850-93	10254
1/23/01	2	10/24/00	1/23/01	MR PET	2319 SE F	561-28	10114
1/24/01	3	11/1/00	1/24/01	ESCAMBI	7733 NOR	850-48	9292
1/24/01	5	1/11/01	1/24/01	THOMAS	223 SUNS	561-65	13715
1/24/01	1	11/3/00	1/24/01	MATHIS	296 FORT	850-93	11321
1/25/01	1	10/24/00	1/25/01	JACK'S	8401 FLOR	561-34	9470
1/25/01	2	10/17/00	1/25/01	ANTHON	1881 SE B	561-33	8784
1/25/01	5	9/25/00	1/25/01	DEALER	8432 JUNI	850-47	7694
1/25/01	1	8/15/00	1/25/01	MAJESTI	137 BAY S	904-24	1676
1/25/01	1	1/8/01	1/25/01	SPLASH	P O BOX 9	305-66	15274
1/25/01	40	11/13/00	12/4/00	ALE HOU	126 CENTE	561-74	12360

1/25/01	1	12/15/00	1/25/01	ASIA NAI	99010 OVE	305-45	12255
1/25/01	4	10/26/00	1/25/01	TLC INS	900 U S HI	561-84	10979
1/26/01	1	1/9/01	1/26/01	OYSTER	65 LEWIS	904-82	6072
1/26/01	2	8/31/00	1/26/01	DIXONS	1109 S SA	407-33	4517
1/26/01	2	9/5/00	1/26/01	SUNSHIN	4220 WES	321-63	4005
1/26/01	1	12/21/00	1/26/01	REDLAN	24856 SW	305-24	14731
1/26/01	3	12/27/00	2/19/01	SOFTHA	4893 HIGH	561-23	14358
1/26/01	7	1/3/01	1/26/01	CITY OF	P O BOX 1	407-66	14097
1/26/01	5	1/24/01	1/26/01	LANDRU	26150 SW	305-24	11591
1/26/01	3	11/10/00	1/26/01	LA RUE'	12705 SHI	904-71	10794
1/29/01	9	10/20/00	1/29/01	VEIN CLI	5150 BELF	904-29	9620
1/29/01	2	9/19/00	1/29/01	DOORW	1070 EME	321-72	6958
1/29/01	1	10/24/00	1/29/01	ISLAND	1343 CLEA	561-58	5363
1/29/01	1	9/5/00	1/29/01	GARRISO	13446 NEV	352-59	5009
1/29/01	2	10/31/00	1/29/01	JT CONS	3918 ROG	904-76	10526
1/30/01	2	10/30/00	1/30/01	PINEHUR	3530 SW 2	352-37	9997
1/30/01	15	10/27/00	1/30/01	PALM BE	2925 10TH	561-43	9833
1/30/01	1	10/23/00	1/30/01	HUNT'S	3918 MOO	407-32	9473
1/30/01	1	10/16/00	2/1/01	ELITE PR	7227 CLIN	561-48	9234
1/30/01	1	10/9/00	1/22/01	AIRPORT	6209 N 9T	850-47	8429
1/30/01	2	10/13/00	1/30/01	PHOENIX	505 BEAC	561-77	6219
1/30/01	2	9/6/00	1/30/01	RUMORS	83 U S HW	407-66	5965
1/30/01	2	8/30/00	1/30/01	GOOD'N	3343 S US	561-46	4931
1/30/01	2	8/29/00	1/30/01	LAURI'S	3866 MEL	561-96	4060
1/30/01	1	9/6/00	1/30/01	CONDRA	1855 OAK	561-79	2581
1/30/01	1	12/29/00	1/30/01	D & L EN	5590 1ST	305-29	14834
1/30/01	1	1/8/01	1/30/01	AVONDA	509 SW 2	954-78	14243
1/30/01	2	11/2/00	2/16/01	QUAINT	1424 MAIT	904-74	10786
1/31/01	2	11/17/00	1/31/01	EAST CO	645 FELS	561-58	9506
1/31/01	1	10/16/00	1/31/01	ALL PRO	2836 ATLA	561-56	8932
1/31/01	1	10/5/00	1/31/01	SOUTHE	2669 FORE	561-96	8438
1/31/01	3	9/22/00	1/31/01	CORPOR	1101 GULF	850-93	7698
1/31/01	3	8/17/00	1/31/01	CARLISL	6077 HILB	850-44	3076
1/31/01	1	1/8/01	2/16/01	P & L CL	444 NORT	321-25	15346
1/31/01	1	12/29/00	1/31/01	VIDEO S	15884 SW	305-25	14751
2/1/01	2	10/24/00		PRO TEC	1711 N PO	954-98	8898
2/1/01	3	10/2/00	2/1/01	J I MAC	1866 NW 5	954-98	8649
2/1/01	1	9/22/00		CAMELLI	830 N RIVE	954-94	7640
2/1/01	1	9/22/00		ALTERAT	604 S FED	954-42	7624
2/1/01	1	9/9/00	2/19/01	KIDDIE K	2480 S CO	561-96	6469
2/1/01	1	9/6/00		ORMON	1482 W G	904-67	5732
2/1/01	1	9/15/00	1/24/01	WARRIO	1102 N FL	305-24	3596
2/1/01	6	9/27/00		GREAT F	1450 N CO	321-45	3176
2/1/01	1	12/27/00		BUSINES	2455 NE 5	561-58	2659
2/1/01	1	1/24/01		BANDITO	7229 S DE	850-26	16201
2/1/01	5	1/31/01	2/19/01	SHELTER	77 COCOP	305-74	15182
2/1/01	4	1/3/01		DEANS S	1436 B SO	850-96	14391
2/1/01	1	1/30/01		DISCRET	1333 OLD	904-82	14121
2/1/01	2	11/3/00		ACE AUT	6548 MOBI	850-94	11692

2/2/01	3	10/16/00		HYPERIO	895 NE DI	561-22	9468
2/2/01	5	8/29/00		SUZZAN	120 INTER	407-33	4020
2/3/01	1	9/8/00		ECONOM	8520 N PA	850-47	6065
2/4/01	7	9/19/00	1/31/01	LUBE AM	11747 PHI	904-26	2158
2/5/01	1	10/27/00	2/20/01	HAIR EX	1205 PARK	407-32	9699
2/5/01	4	10/31/00		DENVER	1542 KING	904-26	7637
2/5/01	3	9/9/00		ENERGY	600 S. US	904-67	6077
2/5/01	1	8/31/00		GALLION	7260 EXLI	904-77	5133
2/5/01	3	8/29/00	1/31/01	CHERISH	1382 HOW	407-86	4300
2/5/01	1	8/23/00	2/1/01	RUDOLP	603 COLO	561-28	3018
2/5/01	1	9/11/00	12/18/00	CHARLE	109 N 29T	561-46	2597
2/5/01	10	1/18/01		REDISH	2156 PON	561-56	13879
2/5/01	1	10/23/00	2/1/01	PUTTING	10925 SW	305-25	10048
2/6/01	14	10/30/00	11/28/00	ADVENT	106285 O	305-45	8920
2/6/01	1	10/5/00		SUNFLO	8802 US H	561-58	8236
2/6/01	1	10/6/00		SMOOTH	2944 POST	904-38	8218
2/6/01	2	9/9/00		DIVERSIF	10796 S. U	561-33	5447
2/6/01	1	9/1/00		E&E TRA	110 JOAC	850-93	4546
2/6/01	1	8/9/00		NAIL BY	675 KINGS	904-21	2036
2/6/01	1	1/8/01		STAFFO	P O BOX 4	407-64	15304
2/6/01	4	12/14/00		KIDS UNI	2800 W 84	305-55	11624
2/6/01	2	11/6/00	2/5/01	J T'S BA	9037 LEM	904-92	10876
2/7/01	1	10/16/00	2/15/01	HOOK A	6963 W N	321-72	9662
2/7/01	3	12/22/00		DESIGNE	4831 N DI	561-36	14740
2/8/01	2	10/18/00		CHRISM	PO BOX 22	904-43	9803
2/8/01	1	10/25/00		SMITH D	8980 S HO	954-43	8613
2/8/01	2	9/15/00		IRISH CO	3154 VIA P	561-27	5292
2/8/01	1	9/1/00		FLETCH	1950 FLAS	321-72	5034
2/8/01	1	1/4/01		K & K M	27907 CO	305-87	15191
2/8/01	1	11/28/00		ELITE CA	5450 WILS	407-32	10403
2/9/01	1	1/4/01		KEYSTO	175 NE SP	561-39	9896
2/9/01	2	9/14/00		DECORA	4215 NOR	561-62	7050
2/9/01	4	1/10/01	2/2/01	CMH UNI	6561 NOR	305-59	14561
2/9/01	2	10/31/00		WETZEL	131 N 2ND	561-46	11332
2/12/01	2	10/16/00		EAST CO	3921 S US	561-46	9503
2/12/01	1	9/21/00	2/7/01	CHINO A	10720 SW	305-25	7510
2/12/01	1	9/5/00		CUSTOM	314 SE 1S	561-27	4705
2/12/01	2	8/10/00	1/9/01	INDIA G	9825 SAN	904-26	1888
2/12/01	5	1/9/01		ARNOFF	3620 S U	561-46	14548
2/12/01	14	1/11/01		HOMES	610 DELTO	407-86	11144
2/12/01	1	11/8/00		QUACKE	3427 E CO	904-73	10801
2/12/01	2	10/27/00		LIL' CHA	P.O. BOX 2	904-75	10559
2/12/01	3	11/30/00		BEACH	655 PENSA	850-93	10233
2/13/01	1	10/12/00		EUROPE	2441 SE O	561-22	9350
2/13/01	2	12/15/00		CENTER	P O BOX 1	561-96	9324
2/13/01	2	8/29/00		INAFEC	404 NE 2N	561-27	5284
2/13/01	4	9/26/00	2/1/01	SCHUYL	44 SPANIS	904-82	3977
2/14/01	1	10/17/00		SANDY'	889 HUNT	321-98	8846
2/14/01	1	10/5/00		HOYTE'S	3420 N CO	321-45	8417

2/14/01	1	9/26/00		INTELLA	5490 HUD	561-43	7999
2/14/01	3	8/29/00		DYNAMI	1425 GENE	321-25	4960
2/14/01	1	9/6/00		BRACO R	6207 ROY	561-79	4205
2/15/01	3	10/24/00		JOSTEN	1316 BERR	321-24	9398
2/15/01	1	10/16/00		DISTINC	14080 CA	352-68	9329
2/15/01	2	10/9/00		SANTA L	2700 W A	954-97	9148
2/15/01	1	10/6/00		ANYTHIN	1412 NW 4	352-37	8829
2/15/01	1	9/8/00		TUTTLE	9063 SUN	850-93	6343
2/15/01	1	1/17/01		DANCE 1	6779 W. IN	561-57	14040
2/15/01	5	12/5/00	2/20/01	CALDWE	116 N TAR	850-43	12727
2/15/01	1	11/22/00		NATURE'	335 CORR	850-45	12443
2/15/01	16	10/31/00		T M S I	720 S 8TH	904-32	10985
2/16/01	2	10/16/00		BUSBEE	2803 E CE	850-46	9642
2/16/01	2	10/23/00		DALLAS	10416 BIS	904-75	9242
2/16/01	3	10/31/00		BALLYH	152 DOVE	305-85	9039
2/16/01	3	10/9/00	2/14/01	AMERIC	241 FITH A	321-83	8805
2/16/01	1	10/4/00		AMERIC	8285 EAST	850-93	8794
2/16/01	1	12/13/00		AUTO JA	5620 S.W	954-96	7671
2/16/01	1	9/21/00		AMERIC	111 NE NA	561-34	6918
2/16/01	1	9/14/00	12/4/00	CONTEM	4031 NW 9	352-33	6907
2/16/01	2	9/9/00		PALM BE	1122 AVIA	561-79	4415
2/16/01	1	12/26/00		BARLOW	4575 J BA	850-67	14365
2/16/01	1	11/16/00		BURLES	708 W DET	850-47	12462
2/16/01	6	11/16/00		ANGELIA	206 ELM A	407-30	12056
2/16/01	2	11/1/00	2/8/01	ROOF LE	P.O. BOX 1	561-43	11111
2/17/01	3	11/15/00		ASSOCI	13357 OVE	305-45	12275
2/19/01	4	1/10/01		MOODY	7150 HOL	954-43	6488
2/19/01	2	8/10/00		CYCLE S	3423 NOR	850-43	3048
2/19/01	1	12/30/00		FLORIDA	538 W PAL	305-24	14734
2/19/01	1	11/22/00		BOLAND	7198 MAP	352-59	12298
2/19/01	2	11/6/00		PARK VI	6226 S BA	904-73	10399
2/20/01	1	2/3/01		HAMM	928 W WH	850-26	5560
2/20/01	2	8/19/00		RACHAL	8060 HILL	904-73	3677
2/20/01	1	12/23/00		BACK ST	1821 NOR	850-43	14212
2/20/01	1	11/22/00		ALL AME	6235 NW 1	954-96	12745
2/20/01	1	11/24/00		CABINET	989 LAURE	561-84	12524
2/20/01	2	11/14/00		ALBERT	83 N ROSC	904-28	12004
2/20/01	2	11/14/00	2/19/01	AMERIC	7296 42N	561-84	11893
2/20/01	2	10/25/00		A LITTLE	305 ACOR	321-38	10567
2/21/01	1	10/27/00		CLASSIC	3346 ROY	904-22	8927
2/21/01	2	10/9/00		BAYOU B	6186 S CO	561-64	8911
2/21/01	2	9/8/00		EAST CO	1751 COG	321-63	4837
2/21/01	4	1/22/01		PRADO	1022 NW 3	305-63	15682
2/21/01	4	12/26/00		CARIBEA	14375 SW	305-27	12701
2/21/01	2	11/14/00		ANNALE	5681 GRA	850-49	11660

Politics & Policy

AT&T Ratchets Up Efforts in Washington Pushing Bell Breakup Plan

By Yochi J. Dreazen

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WASHINGTON -- Earlier this month, Republican Sen. Ted Stevens introduced legislation backed by AT&T Corp. that would break up so-called Bell companies such as Verizon Communications. A few hours after doing so, Mr. Stevens boarded a plane to his home state of Alaska for a fishing trip with AT&T's chief executive, C. Michael Armstrong.

Mr. Stevens's support represents a rare success for AT&T in its struggle to forge closer ties with lawmakers and regulators as part of its campaign to break into the Bells' markets. The long-distance company, seeking to enter a branch of familiar territory after a failed foray into cable, argues that the Bells unfairly dominate local telephone-service markets. AT&T and other Bell opponents propose a radical solution: splitting the Bells into separate retail and wholesale divisions, or even into two stand-alone companies.

The plan's backers say it would foster competition -- and lower prices -- by putting newer entrants in the local-phone arena on a more-equal footing with the Bells.

ATT declined to comment on any meetings between Mr. Armstrong and Washington lawmakers. A spokeswoman for Mr. Stevens said he and Mr. Armstrong have a "longstanding relationship." But she wouldn't confirm or deny that the senator joined Mr. Armstrong on a fishing trip, saying no one in Mr. Stevens's office knew his whereabouts on the day in question.

For more than a year, AT&T lobbyists have been prowling legislatures and public-utility commissions in an effort to find a state willing to order a so-called structural separation of one of the regional Bells. In New Jersey, one of 12 states considering the issue, regulators just concluded a series of contentious public hearings on whether to break Verizon's operations there into separate divisions. A decision is expected by the end of the year, but if precedent is any indication, AT&T is likely to be disappointed.

In September, for example, Pennsylvania regulators proposed splitting Verizon's operations in the state into separate retail and wholesale units. The New York-based Bell fought back, spending millions of dollars on newspaper advertisements and commercials warning residents that the plan would cost jobs and hurt consumers. In the end, the regulators backed down and ordered only a "functional separation" that is expected to have little to no impact on Verizon's operations there. Similarly, a Maryland legislator shelved a breakup plan she had written in the face of a fierce Bell lobbying push, though she says she may reintroduce it.

While it continues to search for receptive state legislators and regulators, AT&T has ratcheted up its efforts here in Washington, where the New York company recently contributed \$570,000 of "soft money" to the Republican and Democratic parties in the first half of the year. Mr. Armstrong has been shuttling to and from the capital in recent months for private meetings with a handful of friendly lawmakers in their Capitol Hill offices and at posh restaurants throughout the city, seeking federal backing.

He and other AT&T executives are likely to increase the frequency of their visits when the

Senate takes up Sen. Stevens's bill, co-sponsored by Commerce Committee Chairman Ernest Hollings (D., S.C.), later this year. In a prescient move, AT&T in November hired as one of its lobbyists David Rudd, former chief of staff to Sen. Hollings, for \$10,000 a month.

"This is a survival issue for us and everyone else trying to offer local phone service alongside the Bells," said Michael Morrissey, AT&T's vice president for public policy. "We need something that gives the Bells the incentive to treat competitors fairly, and we're reluctantly coming to the conclusion that structural separation may be the only thing that works."

Bell officials, who have been on the offensive in their own drive to invade AT&T's long-distance market, now find themselves watching their rear. In recent months, Verizon CEO Ivan Seidenberg has been to Washington repeatedly to drum up opposition to the Stevens-Hollings bill. The local-phone companies also promise to go to court to fight any state-ordered structural-separation plan. The Bells accuse AT&T of playing dirty by funding more than a dozen advocacy groups, such as the Massachusetts Coalition for Competitive Phone Service, without always disclosing that support in the groups' public statements and advertisements. AT&T denies any attempt to mislead the public.

"A breakup would not only hurt us -- it would harm our consumers by making their lives more confusing and their rates more expensive," said Verizon spokesman Eric Rabe.

The Bells, battle-tested in many of the state fights, are marshaling their forces to kill the Stevens-Hollings bill. The four companies -- Verizon, BellSouth Corp., SBC Communications and Qwest Communications International Inc. -- have contributed \$598,038 of soft money to the major parties so far this year.

The high-stakes fight underscores a central failing of the landmark 1996 Telecommunications Act, which was supposed to spark greater competition in local phone service and lower prices. The act was built around the assumption that the Bells would be willing to relax their control over local markets in exchange for the right to offer long-distance service to their own customers. After it was enacted, dozens of smaller upstarts announced ambitious plans to enter local markets by leasing equipment and access lines from the Bells and selling service under their own names.

Five years later, many of those companies have disappeared, and little meaningful competition exists for local phone service. Federal Communications Commission data show Bell rivals controlled just 8.5% of the nation's total phone lines as of the end of last year, though the numbers were double their year-earlier levels. Local phone-service prices, meanwhile, haven't budged even as prices for other telecommunications services, such as wireless and long distance, have plummeted.

The Bells say their smaller rivals died because of poorly designed business models, a slowing economy that made it nearly impossible to raise needed capital and overly ambitious expansion plans.

But AT&T and many of the small upstarts say the Bells have deliberately stifled competition by charging such high rents for needed equipment that newer companies lose money on every local customer they sign up. The only solution, AT&T says, is for each Bell to create a wholesale arm that would own its phone network and sell access to other carriers, as well as to its own retail division. In theory, such an arrangement would remove any incentive for the Bells to charge rivals artificially high prices.

Under the legislation introduced by Sens. Stevens and Hollings, the Bells would have to split their wholesale and retail operations into functionally separate divisions within a year of the law's enactment. If the Bells were found to engage in anticompetitive behavior such as

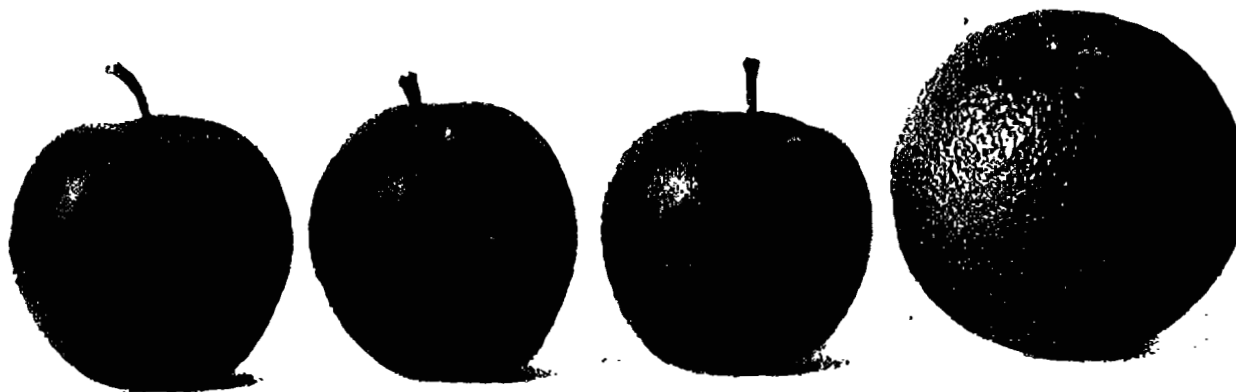
discriminatory pricing within the second year, the FCC would have the authority to break the Bells into stand-alone companies with outside ownership and separate officers and directors.

AT&T officials concede that they face an uphill fight in securing breakup legislation, but insist splitting the Bells is necessary and practical to prevent the Bells from cementing their control of local markets. "The Bells react to the idea of structural separation like Superman reacts to Kryptonite -- they recoil at the mere mention of it and say it's too radical," said Jim Cicconi, who heads AT&T's Washington office. "But all it would do is force the Bells to act like Switzerland and make money by selling to all comers on the same terms."



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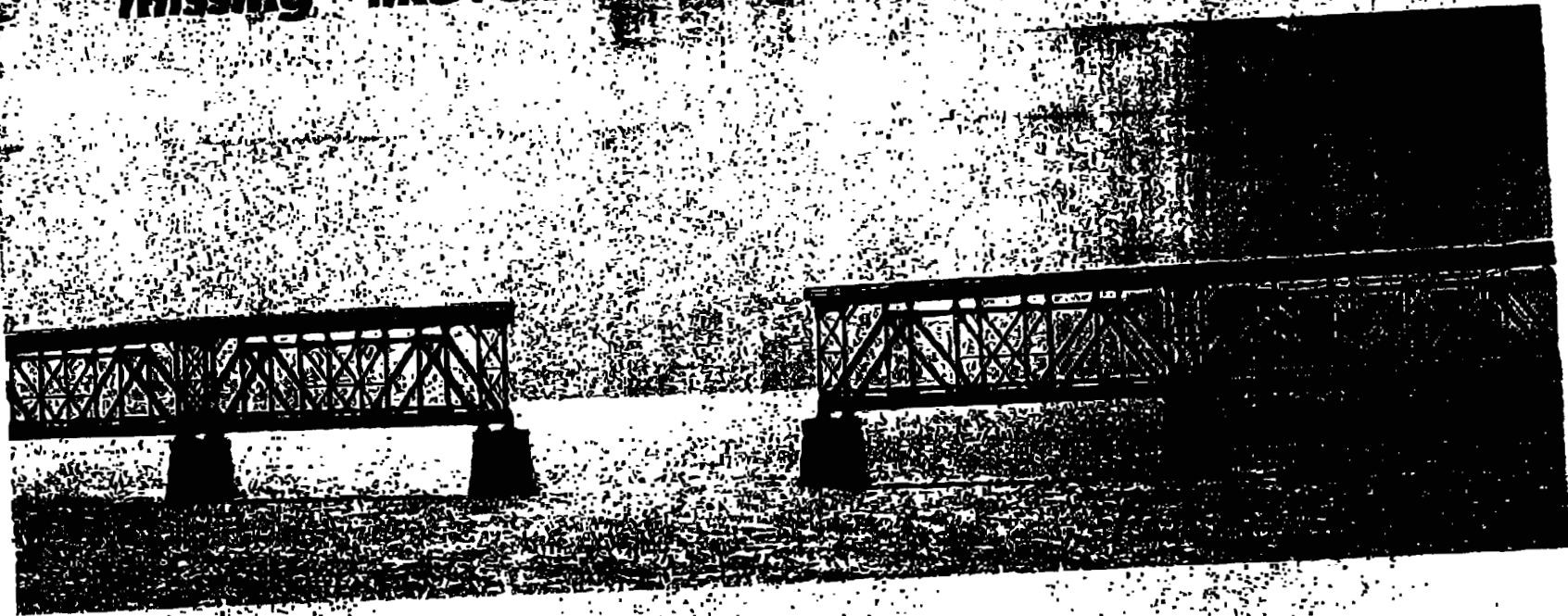
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