

LAW OFFICES
MESSER, CAPARELLO & SELF
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876
TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE: (850) 222-0720
TELECOPIER: (850) 224-4359
INTERNET: www.lawfla.com

ORIGINAL

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COMMISSION CLERK

January 10, 2002

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 011077-TL

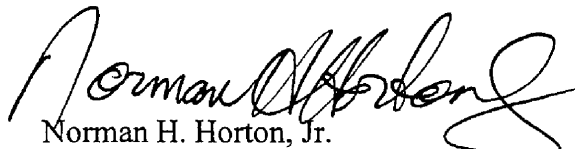
Dear Ms. Bayó:

Enclosed for filing on behalf of e.spire Communications, Inc. are an original and fifteen copies of e.spire's Comments in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,


Norman H. Horton, Jr.

- APP
- CAF
- CMP
- COM
- CTR
- ECR
- LEG
- OPC
- PAI
- RGO
- SEC
- SER
- OTH

NHH/amb
Enclosures
cc: Renee Terry, Esq.
Parties of Record

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00441 JAN 11 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Generic Investigation into whether)
competitive practices of incumbent and)
alternative local exchange carriers comply)
with Section 364.01(4)(G), Florida Statutes)
_____)

Docket No. 011077-TL

Filed: January 11, 2002

COMMENTS OF e.spire COMMUNICATIONS, INC.

Pursuant to the Staff memo of December 20, 2001, requesting comments and prioritization of issues, e.spire provides the following preliminary comments:

1. Attached is a copy of the ranking of the staff-listed issues prepared by e.spire. Not all issues have been ranked but that is not an indication that they are not of interest or concern to e.spire; nor is this an indication that e.spire would not want to address these during this proceeding.

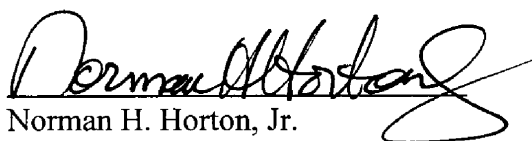
Similarly, these rankings are not final or permanent but may change as required. There may also be other issues identified by other parties which would be of interest to e.spire as well.

2. As a general comment, e.spire would express a continuing concern with the win-back programs and with ILEC activities that delay or deny the ability to provide service to customers on the same terms and conditions as that provided by ILECs to customers.

3. e.spire appreciates the efforts of the staff in this investigation and encourages the Commission to move forward with the investigation.

DOCUMENT NUMBER-DATE
00441 JAN 11 02
FPSC-COMMISSION CLERK

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Norman H. Horton, Jr.", with a large, stylized flourish extending to the right.

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 S. Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720

Attorneys for e.spire Communications, Inc.

Competitive Practice	Priority Ranking
Refusal to Convert Special Access	1
Sharing of Information Between Retail and Wholesale Units	1
Use of Remote Switches Create a Barrier to Entry	
Misinformation Provided to Customer Regarding A Competing Carrier	1
Disparaging Comments Made to Customer Regarding a Competing Carrier	1
Unreasonable Engineering Requirements for Conduit Entrance	
Refusal to Port Numbers To Customer Who Has Switched Carriers	1
Refusal to Transfer Customers With Outstanding Bills	
Loss of Dial Tone and/or Ancillary Services During the Switch	2
Phone Service Disruptions After the Switch	
Win-Back Programs	1
Disconnect and New Connect Orders Separated During the Conversion Process	
LSR Immediately Stamped "Pending Facilities", Even Though Facilities Are Currently In-Service	2
Multiple Billing Errors	
Escalation Procedures Do Not Result in the Timely Resolution of Issues	1
Establishing Cross Connects Without Permission	
Caller ID Boxes Do Not Recognize Ported Numbers	
ILEC Techs Not Properly Trained on New Loop Products, Results in Bad Loops and ILEC Will Not Help Troubleshoot	
No Dispute Process for a PIC Change	
ILEC Charging ALEC for PIC Change Yet ALEC is Preparing the Paperwork	
Prolonged Period of Time Elapses Before ILEC Takes Action to Determine Service Quality Problem	
Problems with Directory Listing Data Base	2
Power Rates Too High at the Remote Switch (Large Differential From ILEC to ILEC)	

Competitive Practice	Priority Ranking
Requirement to Ground the Smart Jacks	
Refusal to Provide Information Regarding Procedure to Convert from Resale to UNE Pricing	
Porting of Large or Multiple Business Telephone Numbers Must Be Completed in Multiple Sessions	1
ILEC Does Not Allow Change from Resale to UNE Pricing if a PIC Freeze is on the Account	
Allows for Expedited Orders in Very Limited Circumstances Even if ALEC is Willing to Pay	1
Performance Measures Don't Apply to Special Access	2
ILEC Sharing Information with Associated CLEC Operations	1
ILEC Fails to Block Calls	
Customer Account Placed on Hold for 15 Days So They Can't Change to An ALEC	1
After the Switch, an Intercept Message Placed on Customer's Phone Number Indicating the Station Has Been Abandoned	
ALEC Refuses to Release Customer to an ILEC	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the e.spire Communications, Inc.'s Comments in Docket No. 011077-TL has been served upon the following parties by Hand Delivery (*) and/or U.S. Mail this 11th day of January, 2002.

Felicia Banks, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White, Esq.
Jim Meza, Esq.
c/o Ms. Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Michael A. Gross, Esq.
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Association, Inc.
246 East 6th Avenue
Tallahassee, FL 32303

Nanette Edwards, Esq.
ITC^Deltacom
4092 South Memorial parkway
Huntsville, AL 35802

Joseph McGlothlin, Esq.
Vicki Kaufman, Esq.
McWhirter Law firm
117 S. Gadsden Street
Tallahassee, FL 32301

David Tobin, Esq.
Florida Public Telecommunications Association
2292 Wednesday St., Suite 1
Tallahassee, FL 32308-4334

Jim P. Lamoureux, Esq.
AT&T
1200 Peachtree Street, NE, Suite 8100
Atlanta, GA 30309

Ms. Lori Reese
NewSouth Communications Corp.
NewSouth Center
Two North Main Street
Greenville, SC 29601-2719

Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Ms. Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Mr. Brian Chaiken
Supra Telecommunications & Information Systems, Inc.
2620 SW 27th Avenue
Miami, FL 33133

Ms. Ann Shelfer
Supra Telecommunications & Information Systems, Inc.
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32302-5027

Catherine F. Boone
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328-3495

Mr. Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue, Suite 2000
Orlando, Florida 32801-1640

Brent E. McMahan
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501-5937

Ms. Dana Shaffer
XO Florida, Inc.
105 Molloy Street, Suite 100
Nashville, TN 32701-2315

Bettye Willis
ALLTEL Corporate Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

Mr. Rodney Page
Access Integrated Networks, Inc.
Riverside Corporate Center
4885 Riverside Drive, Suite 101
Macon, TA 31210-1161

J. Jeffrey Wahlen
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302

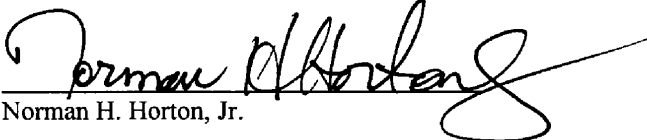
William Rodney
General Counsel
Global NAPS, Inc.
10 Merrymount Road
Quincy, MA 02169

Donna McNulty
MCI WorldCom
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

F. B. Poag
MC FLTLHO0107
P.O. Box 2214
Tallahassee, FL 32316-2214

Brian Chaiken
Supra Telecommunications and
Information Systems, Inc.
2620 SW 27th Avenue
Miami, FL 33133

Ms. Michelle A. Robinson
c/o Mr. David Christian
Verizon Florida, Inc.
106 East College Avenue, Suite 810
Tallahassee, FL 32301-7704


Norman H. Horton, Jr.