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January 11, 2002

VIA HAND DELIVERY

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Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No. 011077-TL

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- The Florida Competitive Carriers Association's Comments and Prioritization of Issues.

Please acknowledge receipt of the above on the extra copies enclosed herein and return it to me. Thank you for your assistance.

Yours truly,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

APP _____
CAF _____
CMP _____
COM _____
CTR _____ encls.
ECR _____
LEG _____
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M. K. Kaufman
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Comer ps

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic Investigation into
Whether Competitive Practices
of Incumbent and Local Exchange
Carriers Comply with Section
364.01(4)(G), F.S.

Docket No. 011077-TP

Filed: January 11, 2002

The Florida Competitive Carriers Association's Comments and Prioritization of Issues

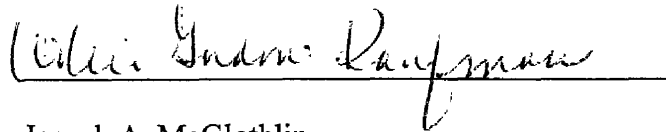
Pursuant to the Staff request in its Memo of December 20, 2001, the Florida Competitive Carriers Association (FCCA) files these preliminary comments and prioritization of the Staff issue list.

1. The FCCA believes that it is critical that the Commission thoroughly investigate and promptly remedy the anticompetitive behavior of incumbents currently occurring in the marketplace. Such behavior presents a large barrier to competitive entry and is, in part, responsible for the relatively small amount of local competition in the Florida market today. The FCCA appreciates the Commission's investigation of these matters and encourages the Commission to move forward quickly with this investigation.

2. However, the FCCA is also concerned regarding the availability of resources to be devoted to this process and encourages the Commission to group like or similar issues together so that they can be resolved at together. FCCA has attempted to make such a grouping (for example, as to issues regarding win back) in the attachment to this pleading and has prioritized some of the Staff identified issues as well as additional issues of importance to the industry. At this time, FCCA has not given every concern identified by Staff a priority number. Rather, FCCA suggests that the parties work on the groups of issues FCCA has prioritized and when those issues are completed,

revisit the list again.

3. Further, FCCA would note that it is important that as new anticompetitive behavior is identified or as issues arise, parties have the opportunity to address them and are not precluded from raising them in this docket (or through other procedures) simply because they are not included on the original priority list from which the Staff and parties initially work.

A handwritten signature in cursive script, reading "Vicki Gordon Kaufman", is written over a horizontal line.

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Attorneys for Florida Competitive Carriers
Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing The Florida Competitive Carriers Association's Comments and Prioritization of Issues has been furnished by (*) hand delivery or by U. S. Mail on this 11th day of January, 2002, to the following:

(*) Beth Keating

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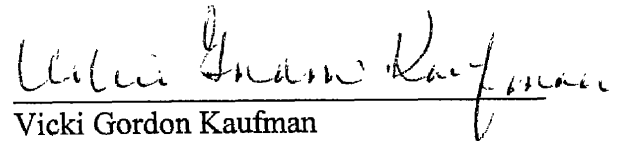
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Vicki Gordon Kaufman

Competitive Practice	Priority Ranking
Refusal to Convert Special Access	5
Sharing of Information Between Retail and Wholesale Units	2
Use of Remote Switches Create a Barrier to Entry	
Misinformation Provided to Customer Regarding A Competing Carrier	3
Disparaging Comments Made to Customer Regarding a Competing Carrier	3
Unreasonable Engineering Requirements for Conduit Entrance	
Refusal to Port Numbers To Customer Who Has Switched Carriers	
Refusal to Transfer Customers With Outstanding Bills	
Loss of Dial Tone and/or Ancillary Services During the Switch	
Phone Service Disruptions After the Switch	
Win-Back Programs	2
Disconnect and New Connect Orders Separated During the Conversion Process	
LSR Immediately Stamped "Pending Facilities", Even Though Facilities Are Currently In-Service	4
Multiple Billing Errors	
Escalation Procedures Do Not Result in the Timely Resolution of Issues	
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	
Power Rates Too High at the Remote Switch (Large Differential From ILEC to ILEC)	
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	
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	
Performance Measures Don't Apply to Special Access	5
ILEC Sharing Information with Associated CLEC Operations	3
ILEC Fails to Block Calls	
Customer Account Placed on Hold for 15 Days So They Can't Change to An ALEC	
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	
UNE pricing*	1
Inadequate training of incumbent wholesale representatives*	3
LCSC operational issues: invalid clarifications, late CSR updates, USOC problems...*	3
Change management process*	3

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* additional issues added by FCCA