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September 5, 2002

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Comments Regarding Proposed Issues List, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver
J. Phillip Carver (lka)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U. S. Mail this 5th day of September, 2002 to the following:

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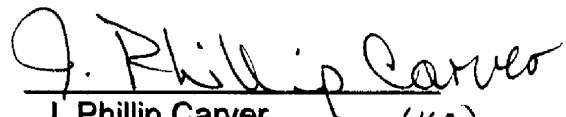
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J. Phillip Carver (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Carriers for Commission Action)	Docket No. 981834-TP
To Support Local Competition)	
In BellSouth's Service Territory)	
In re: Petition of ACI Corp. d/b/a)	
Accelerated Connections, Inc. for)	Docket No. 990321-TP
Generic Investigation into Terms and)	
Conditions of Physical Collocation)	Filed: September 5, 2002

**COMMENTS OF BELL SOUTH TELECOMMUNICATIONS, INC.
REGARDING PROPOSED ISSUES LIST**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files its Comments Regarding Proposed Issues List, and states the following:

1. On August 15, 2002 the Staff of Florida Public Service Commission ("Commission"), issued a Memorandum along with a proposed list of issues. In this memorandum, the Staff requested that parties submit their own proposed issues, and that they state their position as to what the pricing issues should be. BellSouth hereby files these Comments in response.

2. Each of the preliminary issues identified by the Staff on the list attached to the Memorandum is acceptable to BellSouth, with one exception. Issue five (5) should be deleted.¹ This issue has been previously addressed in this docket and was resolved by the Commission in Order No. PSC-00-0941-FOF-TP, issued May 11, 2000. BellSouth is unaware of any circumstances that would justify revisiting the Commission's previous decision on this issue.

3. BellSouth also proposes two additional issues. The two new issues are as follow:

1. What cancellation charges should apply if an ALEC cancels its request for collocation space?

¹ Issue five (5) reads: "Under what circumstances can an ILEC restrict the type of equipment that an ALEC locates in the collocation space"?

2. Should an ALEC be required to justify its space reservation needs to the ILEC and/or Commission when an ILEC is forced to consider a building addition to accommodate future space requirements?
4. BellSouth also proposes that two sub-issues be added to the Staff's proposed Issue 2:

Staff Proposed Issue 2:

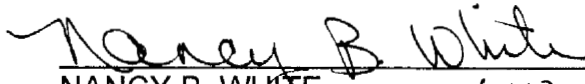
Under what conditions should an ILEC be allowed to reclaim unused collocation space?

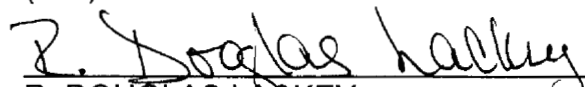
- (a) What obligation does an ALEC have to notify all third parties with a vested financial interest in its equipment when the ALEC terminates occupancy, abandons its collocation space, or is disconnected for non-payment?
- (b) What obligation does an ALEC have to notify the ILEC of any third parties that have a financial interest in the ALEC's equipment?

5. Finally, BellSouth states that it does believe that the rates for collocation elements should be set as part of this proceeding. The Staff-proposed issues 12 and 13 raise, in general terms, the pertinent rate issues. BellSouth believes that these issues, as proposed by Staff, are broad enough to accommodate all testimony and other evidence that the Commission must consider to resolve the pricing issues. Therefore, BellSouth does not believe that it is necessary to propose any additional, more specific issues concerning collocation pricing.

Respectfully submitted this 5th day of September 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.


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