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October 4, 2002

Mrs. Blanca Bayo, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 323099-0850

RE: Docket No. 020611-TP – Complaint of BellSouth Telecommunications, Inc., regarding Supra Telecommunications and Information Systems, Inc.’s Inappropriate Use of Lens

Dear Mrs. Bayo:

Enclosed is the original and 15 Copies of Supra Telecommunications and Information Systems, Inc.’s (Supra Telecom) Proposed Issues List in the above captioned docket.

I have enclosed a copy of this letter, please mark it to indicate that the original was filed, and thereupon return to me.

Sincerely,

Paul D. Turner
Assistant General Counsel

Enclosures

DOCUMENT NUMBER DATE
10767 OCT-4 02
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

Docket No. 020611-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery, First Class U.S. Mail and/or Facsimile this 4th day of October, 2002 to the following:

Beth Keating
Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy B. White
James Meza III
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

SUPRA TELECOMMUNICATIONS &
INFORMATION SYSTEMS, INC.
2620 S.W. 27th Avenue
Miami, Florida 33133
Telephone: 305/476 – 4228
Facsimile: 305/443 – 9516

By: Paul D. Turner /PDT
PAUL D. TURNER ESQ.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of BellSouth)
Telecommunications, Inc., regarding)
Supra Telecommunications and)
Information Systems, Inc.'s,)
Inappropriate Use of LENS)
_____)

Docket No. 020611-TP
Filed: October 4, 2002

**SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
PROPOSED ISSUES LIST**

- Issue 1: Does BellSouth's ALEC OSS network configuration violate Chapter 364, Florida Statutes?
- Issue 2: Does BellSouth's ALEC OSS network configuration provide ALECs with non-discriminatory access?
- Issue 3: Are there any restrictions (e.g., contractual, statutory or otherwise) on Supra's use of BellSouth's ALEC OSS?
- Issue 4: Has Supra violated any such restrictions?
- Issue 5: If Supra has violated such restrictions, has BellSouth been harmed?
- Issue 6: What constitutes BellSouth's ALEC OSS network downtime (e.g., scheduled and/or unscheduled and/or announced and/or unannounced)?
- Issue 7: Does BellSouth properly report and/or announce its ALEC OSS network downtime?
- Issue 8: Is the determination of BellSouth's ALEC OSS network downtime a legitimate business purpose?
- Issue 9: What amount of traffic should BellSouth's ALEC OSS network reasonably support?
- Issue 10: What amount of BellSouth's ALEC OSS network downtime is considered acceptable?
- Issue 11: What is the amount of BellSouth's ALEC OSS network downtime compared to the downtime experienced by BellSouth's OSS network?

- Issue 12: What is the amount of supportable traffic by BellSouth's ALEC OSS network as compared to the amount of supportable traffic of BellSouth's OSS network?
- Issue 13: What is the amount of unique users, supportable by BellSouth's ALEC OSS network, as compared to the amount of unique users supportable by BellSouth's OSS network?
- Issue 14: Does the FPSC have the authority to award damages regarding this dispute?
- Issue 15: If this dispute arising between the parties is "beyond the scope of the parties' interconnection agreement," can either party be found to be in breach of that agreement?

Respectfully submitted this 4th day of October 2002.

SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.



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