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June 2, 2003

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
And Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No.: 030103-TP
Complaint of MCImetro Access Transmission Services LLC
and MCI WORLDCOM Communications, Inc. Against BellSouth
for Overcharging for High-Capacity Circuits**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s List of Proposed Issues, 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,



Meredith E. Mays

(CM)

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

492979

DOCUMENT NUMBER-DATE

04886 JUN-28

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 030103-TP

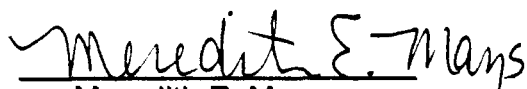
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U.S. Mail this 2nd day of June, 2003 to the following:

Linda Dodson
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Commission
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Meredith E. Mays
Meredith E. Mays (CKA)

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of:)	
)	
Complaint of MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. Against BellSouth for Overcharging for High-Capacity Circuits)	Docket No. 030103-TP
)	Filed: June 2, 2003
)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
LIST OF PROPOSED ISSUES**

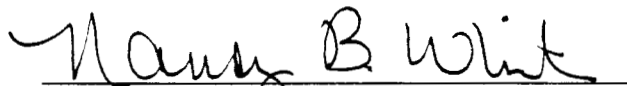
In accordance with the Memorandum issued in this docket on May 27, 2003, BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following list of proposed issues for consideration in this docket. The issues stated herein are preliminary in nature and are made consistent with the Commission's May 27, 2003 Memorandum. In the event that additional issues are identified or discussed during the meeting scheduled to occur on June 4, 2003, BellSouth reserves the right to supplement, revise, or modify this list. BellSouth's proposed issues are:

1. Should the Commission consider the complaint of MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively "MCI") as it relates to the MFS Agreement and the 1997 Agreement (as both Agreements are defined in the Complaint)?
 - A. Should the doctrine of laches bar any of MCI's claims relating to the MFS Agreement and/or the 1997 Agreement?
 - B. Should the doctrine of waiver bar any of MCI's claims relating to the MFS Agreement and/or the 1997 Agreement?
 - C. Should the doctrine of estoppel bar any of MCI's claims relating to the MFS Agreement and/or the 1997 Agreement?
2. Should the Commission bar or hold in abeyance any or all of MCI's claims due to its failure to exhaust the dispute resolution process set forth in the interconnection agreements?
3. Is MCI entitled to the benefit of TELRIC-based rates for that portion of facilities used to transport interstate and intrastate access traffic?

4. When an interconnection agreement does not include a rate for a particular service, have the parties reached agreement on the price for such service?
5. If the parties have not reached agreement on the price for a service, does the party requesting such a service order it from BellSouth's tariffs at the applicable tariff rates?
6. Do the terms, conditions, and prices of the interconnection agreements executed in 2001 (as defined in MCI's Complaint) apply retroactively from the expiration date of the 1997 Agreement (as defined in MCI's Complaint), June 19, 2000, forward?
7. Should MCI be required to submit requests for local services using the correct method for ordering such services; for example, by using a local service request ("LSR") when applicable?

Respectfully submitted this 2nd day of June, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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