ORIGINAL

ANDREW D. SHORE Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0765

July 8, 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



Legal Department

Re: <u>Docket No. 030339-TP (Allegiance Arbitration)</u>

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Proposed Issues list, which we ask that you file in the captioned docket.

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,

Andrew D. Shore

(KA)

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

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CAF

CMP

MMS

DOCUMENT NUMBER-DATE

CERTIFICATE OF SERVICE DOCKET NO. 030339-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and Facsimile this 8th day of July 2003 to the following:

Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-xxxx
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John Gockley Allegiance Telecom of Florida, Inc. 700 E. Butterfield Road, Suite 400 Lombard, IL 60148 Tel. No. (630) 522-5200 Fax. No. (630) 522-5204

Michael C. Sloan Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., Suite 300 Washington, D.C. 20007-5116 Tel. No. (202) 295-8458 Fax. No. (202) 424-7643 mcsloan@swidlaw.com Counsel for Allegiance

Nancy B. White

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Allegiance Telecom of)	
Florida, Inc. for Arbitration of Certain Terms)	
and Conditions of Proposed Interconnection)	Docket No. 030339-TP
and Resale Agreement with BellSouth)	
Telecommunications, Inc. Under the)	
Telecommunications Act of 1996)	Filed: July 8, 2003
)	•

BellSouth's Proposed Issues

- 1. Should the Agreement between BellSouth Telecommunications Inc. ("BellSouth") and Allegiance Telecom of Florida, Inc. ("Allegiance") limit the parties' initial recourse for unresolved disputes arising out of or relating to a provision of the interconnection agreement by pursuing resolution through the Florida Public Service Commission ("the Commission") and the FCC?
- 2. Following a request by Allegiance to convert a special access arrangement to a combined loop and transport network element (EEL), when should BellSouth cease billing the special access rate and begin to bill the lower UNE rate for the EEL?
- 3. Should the agreement between BellSouth and Allegiance address what percentage of EELs must be non-compliant before Allegiance must bear the full expense of an audit?
- 4. If an audit finds an EEL non-compliant, how far back should BellSouth be allowed to bill at the special access services rate?
- 5. It is appropriate to cap the amount by which BellSouth may increase the required insurance limits during the term of the Agreement?
- 6. Is it appropriate to specify the minimum level of customer detail to be contained on a CSR and available for Allegiance's review with customer permission?
 - 7. When should payment for services be due?
- 8. When is it appropriate to demand a security deposit, in what amount, and under what conditions should the security deposit be released?
 - 9. How far may BellSouth back bill for all services?

DOCUMENT NUMBER -DATE

06055 JUL-88

Respectfully submitted this 8th day of July 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B/WHITE

JAMES MEZA, III

c/o Nancy H. Sims

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