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HOUSTON, TEXAS
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September 9, 2003

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32299-0850

Re: Request for Interconnection negotiations with Northeast Florida Telephone Company ("NEFCOM").

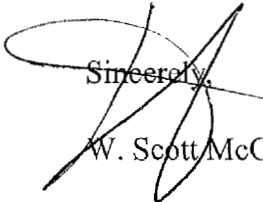
In its letter dated July 16, 2003 Southeastern Services, Inc. ("SSI") submitted a request to NEFCOM for interconnection under 251(a) and (b) of the Federal Communications Act. SSI also submitted a bona fide request for interconnection, transport and termination, collocation, unbundled network elements and resale at cost based and/or avoided cost pricing to NEFCOM. SSI filed a copy with the Florida PSC (see attachment) pursuant to section 251(f)(1)(B), given NEFCOM's claim of rural status.

SSI believed the simultaneous submission of this request to NEFCOM and the Florida PSC to be adequate notice of the bona fide request to the Florida PSC. To the extent, however, notice was insufficient SSI hereby gives notice to the Florida PSC of its bona fide request to NEFCOM.

SSI requests that the Florida PSC begin processing this matter and make the determinations required by §251(f)(1)(B).

Please contact me if you have any questions.

Thank You.


Sincerely,
W. Scott McCollough

xc: NEFCOM

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FPSC-COMMISSION CLERK

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July 16, 2003.

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030000

Deborah Nobles
Vice President of Regulatory Affairs
Northeast Florida Telephone Company
505 Plaza Circle
Suite 200
Orange Park, FL 32073-9409

RE: Request for Interconnection negotiations

I am the authorized representative of Southeastern Services, Inc. Southeastern Services, Inc. is a certificated CLEC as a result of the Florida PSC's Order No. PSC-99-1025-TC, in Docket No. 990431-TL. Pursuant to §§ 251-252 of the Communications Act of 1934, as amended (Communications Act), as of the date of your receipt of this letter, Southeastern Services, Inc. hereby requests that Northeast Florida Telephone Company (NEFCOM) immediately commence negotiations intended to result in the execution of a nondiscriminatory interconnection agreement for the state of Florida consistent with the provisions of §§ 251 and 252 of the Communications Act.

Section 251 imposes a general duty on non-exempt ILECs to provide interconnection (A) for the transmission and routing of telephone exchange service and exchange access, (B) at any technically feasible point within the ILEC's network, (C) is at least equal in quality to that provided by the ILEC to itself, its affiliates or any other party to which the ILEC provides interconnection, and (D) at rates, terms and conditions which are just, reasonable and nondiscriminatory. 47 U.S.C. § 251(c)(2). ILECs also have a duty to provide nondiscriminatory access to network elements on an unbundled basis at any technically feasible point, 47 U.S.C. § 251(c) (3), to offer its local telephone services for resale at wholesale rates, 47 U.S.C. § 251(c)(4), and to facilitate collocation of equipment necessary for interconnection or access to unbundled network elements. 47 U.S.C. § 251(c) (6).

We understand that NEFCOM claims to be an exempt carrier under § 251(f)(1). Southeastern Services lacks sufficient information to determine whether NEFCOM is in fact entitled to exempt status. To the extent, however, that NEFCOM is exempt this letter constitutes a bona fide request for interconnection, traffic exchange, collocation, unbundled network elements and resale at cost based and/or avoided cost pricing.

Regardless of whether NEFCOM is allowed by the Florida PSC to maintain its alleged exempt status, NEFCOM is still required to interconnect with requesting carriers under § 251(a)(1). Further, under § 251(b), NEFCOM must allow resale on reasonable terms and provide number portability, dialing parity, access to rights-of way and reciprocal compensation consistent with the Communications Act and FCC rules. Southeastern Services hereby invokes

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FPSC COMMISSION CLERK

its rights under the entirety of §§ 251 and 252 and seeks a comprehensive interconnection agreement with NEFCOM.

Please contact me at 512.485.7920 no later August 4, 2003 to begin our discussions. I propose that an initial meeting be scheduled as soon as possible.

Thank you.

~~Sincerely,~~

W. Scott McCollough

xc: Mark Woods
Southeastern Services, Inc.