

ORIGINAL

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October 21, 2003

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COMMISSION
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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. 030851-TP: Implementation of requirements arising from Federal Communications Commission Triennial UNE Review: Local Circuit Switching for Mass Market Customers**

Re: **Docket No. 030852-TP Implementation of requirements arising from Federal Communications Commission Triennial UNE review: Location Specific-Review For DS1, DS3, and Dark Fiber Loops and Route-Specific Review for DS1, DS3, and Dark Fiber Transport**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Proposed Issue List, in the captioned dockets.

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,

Nancy B. White
Nancy B. White (EB)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
509539

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CERTIFICATE OF SERVICE
Docket Nos. 030851-TP and 030852-TP

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

Electronic Mail this 21st day of October 2003 to the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: October 21, 2003
)

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030852-TP
Triennial UNE review: Location Specific-Review)
For DS1, DS3, and Dark Fiber Loops and) Filed: October 21, 2003
Route-Specific Review for DS1, DS3, and Dark)
Fiber Transport)
)

BELLSOUTH'S PROPOSED ISSUE LIST

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following list of proposed issues for consideration in these dockets. The issues stated herein are preliminary in nature; in the event that additional issues are identified or discussed during the issue identification conference on October 23, 2003, BellSouth reserves the right to supplement, revise, or modify this list. BellSouth's proposed issues are:

Docket 030851-TP

Definitions [51.319(d)(2)(i)]

1. What is the definition of "market" and what are the relevant markets in BellSouth's service area?
2. What is the definition of "mass market customer"?
3. What is the definition of "enterprise customer"?

Switching Triggers [51.319(d)(2)(iii)(A)]

4. Are either of the “triggers” that mandate a finding of non-impairment with respect to mass market customers satisfied in any of BellSouth’s markets in Florida?
 - a. In which markets in BellSouth’s service area are there three or more competing carriers not affiliated with each other or BellSouth, including intermodal providers of service comparable in quality to BellSouth, serving mass market customers with their own switches?
 - b. In which markets in BellSouth’s service area are there two or more competing carriers not affiliated with each other or BellSouth, including intermodal providers of service comparable in quality to BellSouth, who have their own switches and are offering wholesale local switching to customers serving DSO capacity loops in that market?

Potential for Self-Provisioning of Local Switching [51.319(d)(2)(iii)(B)]

5. If neither of the “triggers” that mandate a finding of non-impairment are satisfied in a particular market, what other factors, if any, demonstrate that CLECs are not impaired without access to unbundled circuit switching for mass market customers?

Transitional Use of Unbundled Local Switching [51.319(d)(2)(c)]

6. If the triggers in § 51.319(d)(2)(iii)(A) have not been satisfied for a given BellSouth market and the analysis of other factors results in a finding that CLECs are impaired in that market absent access to unbundled local switching, would the CLECs’ impairment be cured if unbundled local switching were only made available on a per customer location for a transitional period of 90 days or more? If so, what should be the duration of the transitional period?

Hot Cut Process [51.319(d)(2)(ii)]

7. Does BellSouth have an operationally seamless batch hot cut process such that BellSouth is capable of migrating multiple lines served using unbundled local switching to switches operated by a carrier other than BellSouth?
 - a. What volume of loops are included in BellSouth's batch hot cut process?
 - b. What specific processes are employed by BellSouth to perform the batch cut taking into account BellSouth's particular network design and cut-over practices?
 - c. What additional performance measures, if any, are necessary to monitor BellSouth's batch hot cut process?
8. Is the cost of BellSouth's batch hot cut rate TELRIC-compliant and does it reflect efficiencies gained in the batch process?
9. In which BellSouth markets, as defined by Issue 1 above, is the absence of a batch cut migrating process not impairing CLECs' ability to serve end users using DS0 loops in the mass market without access to local circuit switching on an unbundled basis?

Docket No. 030852-TP

High Capacity Loop Triggers [51.319 (a)(4), (a)(5), (a)(6)]

1. At which specific customer locations have the triggers set forth below been satisfied, such that a finding of non-impairment is required:
 - a. Two or more competing carriers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in quality to BellSouth, have deployed their own facilities with a transmission capacity of DS3 level or higher and are serving customers via those facilities at that location;

- b. Two or more competing carriers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in qualify to BellSouth, have deployed their own dark fiber facilities at that location;
- c. Two or more competing carriers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in qualify to BellSouth, have deployed their own facilities and offer loops on a widely available wholesale basis at a DS1 transmission level or above.

Potential for Self-Provisioning of High Capacity Loops [51.319(a)(5)(ii), (6)(ii)]

- 2. If none of the “triggers” that mandate a finding of non-impairment relating to high capacity loops are satisfied in a particular market, what other factors, if any, demonstrate that CLECs are not impaired without access to DS3 loops or dark fiber loops at specific customer locations?

Transport Triggers [51.319(e)(1), (2), and (3)]

- 3. At which specific transport routes have the triggers set forth below been satisfied, such that a finding of non-impairment is required:
 - a. Three or more competing carriers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in qualify to BellSouth, have deployed their own transport facilities with a transmission capacity of DS3 level or above and are operationally ready to use those transport facilities;
 - b. Two or more competing carriers, not affiliated with each other or the ILEC, including intermodal providers of service comparable in qualify to BellSouth, have deployed their own transport facilities and are operationally ready to provide

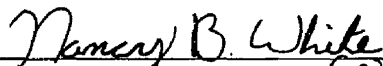
wholesale transport at a DS1 or greater transmission level on a widely available basis.

Potential for Self-Provisioning of Transport [51.319(e)(2)(ii), and (3)(ii)]


4. If none of the “triggers” that mandate a finding of non-impairment relating to high capacity transport are satisfied in a particular market, what other factors, if any, demonstrate that CLECs are not impaired without access to DS3 or dark fiber transport on a particular route?

Respectfully submitted this 21st day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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