

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

October 24, 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. 030829-TP Complaint of FDN Communications for Resolution of  
Certain Billing Disputes And Enforcement of UNE Orders and  
Interconnection Agreements with BellSouth Telecommunications, Inc.**

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 (NB)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
510026

DOCUMENT NUMBER DATE

10525 OCT 24 03

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 030829-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail this 24<sup>th</sup> day of October, 2003 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
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Scott A. Kassman, Esq.  
FDN Communications  
390 North Orange Avenue  
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Orlando, FL 32801  
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mfeil@mail.fdn.com  
skassman@mail.fdn.com

  
Meredith E. Mays (CD)

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re:	)	
	)	
Complaint of FDN Communications for	)	Docket No. 030829-TP
Resolution of Certain Billing Disputes	)	
And Enforcement of UNE Orders and	)	Filed: October 24, 2003
Interconnection Agreements with	)	
BellSouth Telecommunications, Inc.	)	
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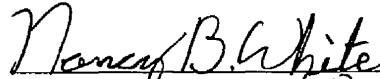
**BELLSOUTH'S PROPOSED ISSUE LIST**

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; in the event that additional issues are identified or discussed during the issue identification conference on October 29, 2003, BellSouth reserves the right to supplement, revise, or modify this list. BellSouth's proposed issues are:


1. Has FDN breached its contractual obligations to BellSouth by failing to pay for disconnect fees?
2. Is FDN's billing dispute claim over disconnect fees barred by the doctrines of res judicata or collateral estoppel?
3. Has FDN breached its contractual obligations to BellSouth by failing to pay for charges relating to the UNE zone changes?
4. If FDN breached its contractual obligations to BellSouth:
  - a. Is FDN obligated to make payment to BellSouth; if so, what amount?
  - b. Is FDN obligated to pay late payment charges or interest to BellSouth; if so, what amount?

Respectfully submitted this 24<sup>th</sup> day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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NANCY B. WHITE (rs)

JAMES MEZA III  
c/o Nancy H. Sims  
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Tallahassee, FL 32301  
(305) 347-5558

  
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R. DOUGLAS LACKEY (rs)

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