

Matilda Sanders

From: terry.scobie@verizon.com
 Sent: Wednesday, November 24, 2004 12:00 PM
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 Cc: Richard Chapkis; David Christian; demetria.c.watts@verizon.com; frank.app@verizon.com; randal.s.milch@verizon.com; tom.parker@verizon.com
 Subject: Docket 041170-TP-Verizon Florida Inc.'s Issues List



Vz Fl. Inc.'s
sues List.pdf

The attached filing is submitted in Docket 041170-TP on behalf of Verizon Florida Inc. by

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(See attached file: Vz Fl. Inc.'s Issues List.pdf)

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November 24, 2004 – VIA ELECTRONIC MAIL

Ms. 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. 041170-TP
Complaint Against Verizon Florida Inc. and Request for Declaratory Ruling
By Bright House Networks Information Services, LLC (Florida)

Dear Ms. Bayó:

Enclosed is Verizon Florida Inc.'s Issues List for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

/s Richard A. Chapkis

Richard A. Chapkis

RAC:tas
Enclosures

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Verizon Florida Inc.'s Issues List in Docket No. 041170-TP were sent via U.S. mail on November 24, 2004 to the parties on the attached list.

/s Richard A. Chapkis

Richard A. Chapkis

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Bright House Networks Information Services,
LLC (Florida),

Complainant,

v.

Verizon Florida Inc.,

Defendant.

Docket No. 041170-TP

VERIZON FLORIDA INC.'S ISSUES LIST

Verizon Florida Inc. ("Verizon") respectfully submits the following list of issues raised by the Complaint and Request for Declaratory Ruling filed by Bright House Networks Information Services, Inc. ("Bright House").

1. Whether the Commission should await the FCC's resolution of the BellSouth Declaratory Ruling proceeding before devoting resources to Bright House's Complaint.
2. Whether the Commission has jurisdiction to determine the terms and conditions under which Verizon must offer DSL transmission for Internet access.
3. Whether the Commission has jurisdiction to determine the terms and conditions under which Verizon Online, an unregulated Verizon affiliate, must offer interstate information services such as DSL-based Internet access.
4. Whether the voice service that Bright House is providing is a form of VoIP service that is within the exclusive authority of the FCC.

5. Whether consumers have choices other than Verizon broadband services, so that if Verizon chooses not to offer service in a particular instance, the competitive market would protect consumers.

6. Whether Bright House's cable affiliate can and does provide broadband Internet access to consumers that receive voice service from Bright House. If so, under what terms and conditions is such access offered?

7. Whether Bright House is being harmed by the Verizon policy it challenges.

8. Whether there are operational and administrative issues that currently prevent compliance with Bright House's demands in this case. If so, whether Verizon is taking steps to try to address those operational and administrative issues.

9. Whether the relief that Bright House seeks would negatively affect competitive DSL providers.

10. Whether the issues raised by Bright House in this docket would be more appropriately raised through the CLEC User Forum ("CUF"), so that all affected parties can be heard and appropriate resolutions worked out.

11. Whether Verizon is entitled to contact the end user to determine if the end user still wants DSL, is willing to pay more for it, and will accept credit card billing.

12. Whether and to what extent Bright House can document delays allegedly associated with Verizon's porting policy.

Respectfully submitted,

s/ Richard A. Chapkis

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November 24, 2004