

ORIGINAL

Matilda Sanders

From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]
Sent: Tuesday, April 26, 2005 11:01 AM
To: Filings@psc.state.fl.us
Cc: Shore, Andrew; Linda Hobbs; Fatool, Vicki; Holland, Robyn P; Nancy Sims; Bixler, Micheale
Subject: Docket 050160-TP
Importance: High
Attachments: 050160-TP BS Proposed Issue List.pdf

- A. Brenda Slaughter
 Legal Secretary for Andrew D. Shore
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
 Tallahassee, FL 32301-1558
 (404) 335-0714
brenda.slaughter@bellsouth.com
- B. Docket No. 050160-TP: Petition of MetroPCS California/Florida, Inc. for Interconnection Arbitration Against BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996
- C. BellSouth Telecommunications, Inc. on behalf of Andrew D. Shore
- D. 4 pages total
- E. Response of BellSouth Telecommunications, Inc. Proposed Issue List

Brenda Slaughter (sent on behalf of Andrew D. Shore)
 BellSouth Telecommunications, Inc.
 Suite 4300 - Legal Department
 675 W. Peachtree Street

MP Atlanta, GA 30375-0001
 OM Phone: (404) 335-0714

TR
 CR <<050160-TP BS Proposed Issue List.pdf>>

3CL
 JPC *****

MMS The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers.

SCR 117

OTH 4/26/2005

DOCUMENT NUMBER-DATE

04043 APR 26 03

FEDERAL COMMUNICATIONS COMMISSION

ANDREW D. SHORE
Senior Regulatory Counsel

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

ORIGINAL

April 26, 2005

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

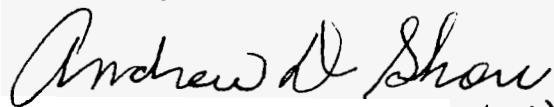
Re: **Docket No. 050160-TP**
**Petition of MetroPCS California/Florida, Inc. for Interconnection
Arbitration Against BellSouth Telecommunications, Inc. Pursuant to
the Telecommunications Act of 1996**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Proposed Issue List, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


Andrew D. Shore (BM)

Enclosure

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

DOCUMENT NUMBER DATE

04043 APR 26 05

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 050160-TP**

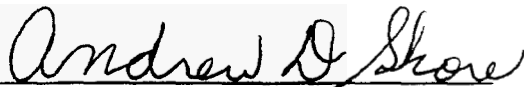
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail this 26th day of April, 2005 to the following:

Jason Rojas
Kira Scott
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6179
jrojas@psc.state.fl.us
kscott@psc.state.fl.us

Charles V. Gerkin, Jr.
FRIEND, HUDAK & HARRIS, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346
Tel. No. (770) 399-9500
Fax. No. (770) 234-5965
cgerkin@fh2.com

Patrick K. Wiggins
Law Offices of Patrick K. Wiggins
Post Office Drawer 1657
513 North Meridian Street (32301)
Tallahassee, FL 32302
Tel No. (850) 222-1358
Fax. No. (850) 222-1359
wigglaw@earthlink.net



Andrew D. Shore

(BIS)

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of MetroPCS California/Florida, Inc.)
For Interconnection Arbitration Against BellSouth)
Telecommunications, Inc. Pursuant to the)
Telecommunications Act of 1996)

Docket No. 050160-TP

Filed: April 26, 2005

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PROPOSED ISSUE LIST**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits this Proposed Issues List in anticipation of the Issue Identification Conference in this docket.

ISSUE 1: Is BellSouth's credit rating relevant in determining whether a CMRS carrier customer of BellSouth's should provide a deposit to BellSouth?

ISSUE 2: Should MetroPCS be permitted to set off undisputed charges owed by BellSouth that are over ninety (90) days past due against amounts that MetroPCS owes BellSouth?

ISSUE 3: What is the basis for the appropriate rate for BellSouth to charge for transiting traffic from MetroPCS to third party carriers, including CLECs and other ILECs and CMRS carriers?

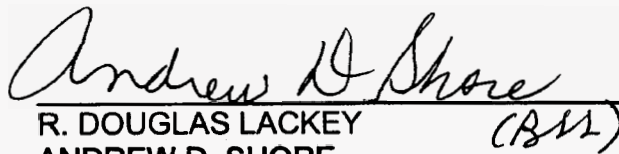
ISSUE 4: When a tandem switch becomes congested, should BellSouth be required to haul MetroPCS' traffic to a new tandem free of charge?

Respectfully submitted this 26th day of April, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.


NANCY B. WHITE (BSS)

c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558


R. DOUGLAS LACKEY (BLL)

ANDREW D. SHORE
Suite 4300, BellSouth Center
675 W. Peachtree Street, NE
Atlanta, GA 30375
(404) 335-0765

#583125