

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint to Enforce Interconnection)	Docket No. 040527-TP
Agreement with NuVox Communications, Inc. by)	Filed: May 2, 2005
<u>BellSouth Telecommunications, Inc.</u>)	

PRELIMINARY ISSUE LISTS OF NUVOX COMMUNICATIONS, INC.

NuVox Communications, Inc. (NuVox), by and through its undersigned counsel, pursuant to Staff's Issue Identification Notice issued on April 13, 2005, submits its Preliminary List of Issues.

1. Did the parties agree to incorporate the concern requirement of the *Supplemental Order Clarification* into their Interconnection Agreement?
2. Has BellSouth demonstrated a sufficient concern to audit any of NuVox's converted EEL circuits?
3. For which NuVox converted EEL circuits, if any, has BellSouth demonstrated a sufficient concern to warrant an audit for any of those specific circuits?
4. Is BellSouth seeking to audit NuVox circuits that were converted after it provided its notice of audit?
 - a. If so, which circuits?
 - b. If so, is this request appropriate for consideration in this proceeding?
5. Did the parties agree to incorporate the independent auditor requirement of the *Supplemental Order Clarification* into their Interconnection Agreement?
6. Does the independent auditor requirement require that the auditor be capable of performing an AICPA-compliant audit?
7. May KPMG serve as an independent auditor for the purpose of auditing any of NuVox's converted EEL circuits?

8. If any audit is permitted, should the audit be limited to NuVox's records?

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing NuVox Preliminary Issue list has been furnished by electronic mail and U.S. Mail to the following this 2nd day of May, 2005:

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