Nancy B. White General Counsel - Florida

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

August 29, 2005

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. 050257-TL: Complaint by BellSouth
Telecommunications, Inc., Regarding the Operation of a
Telecommunications Company by Miami-Dade County in Violation of
Florida Statutes and Commission Rules

Dear Ms. Bayó:

Enclosed is of BellSouth Telecommunications, Inc.'s Proposed Issues, 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,

Cancy B. White/V.F.

cc: All Parties of Record Jerry D. Hendrix R. Douglas Lackey

CERTIFICATE OF SERVICE Docket No. 050257-TP

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

Electronic Mail and First Class U. S. Mail this 29th day of August, 2005 to the following:

Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us

Robert A. Ginsburg Miami-Dade County Attorney David Stephen Hope, Esq. **Assistant County Attorney** Miami-Dade County Attorney's Office **Aviation Division U.S. Mail Address** P.O. Box 592075 AMF Miami, Florida 33159-2075 Miami International Airport **Terminal Building** Concourse A, 4th Floor Miami, FL 33122 Tel. No. (305) 876-7040 Fax No. (305) 876-7294 dhope@miami-airport.com

Jean L. Kiddoo
Joshua M. Bobeck
Danielle C. Burt
Swidler Berlin LLP
3000 K Street, N.W., Ste. 300
Washington, D.C. 20007
Tel. No. (202) 424-7500
Fax. No. (202) 424-7647
ilkiddoo@swidlaw.com
imbobeck@swidlaw.com
dcburt@swidlaw.com

Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth Tele-)	Docket No. 050257-TL
Communications, Inc., Regarding)	
The Operation of a Telecommunications)	
Company by Miami-Dade County in)	
Violation of Florida Statutes and)	
Commission Rules)	
)	Filed: August 29, 2005

BELLSOUTH'S PROPOSED ISSUES

BellSouth Telecommunications, Inc. ("BellSouth") hereby submits the following proposed list of issues to be discussed at the Issue Identification Conference scheduled for September 9, 2005, in the above-captioned proceeding:

- 1. Is Miami-Dade County operating as a telecommunications company at any County-owned airports?
- 2. If the Commission determines that the County is operating as a telecommunications company, what type of telecommunications company is it operating as?
- 3. If Miami-Dade County is operating as a telecommunications company, is it subject to the jurisdiction of the Commission?
- 4. If the Commission determines that the County is operating as an STS provider, does Commission Rule 25-24.580 (Airport Exemption Rule) exempt the County:
 - (a) from the requirement to secure a certificate of public convenience and necessity from the Commission as an STS provider; or
 - (b) from any other Commission requirements applicable to STS providers, including, for example, payment of regulatory assessment fees?
- 5. If the Commission determines that the answer to (4)(b) is yes, from what other requirements applicable to STS providers is the County exempt?

Respectfully submitted this 29th day of August, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE SHARON R. LIEBMAN MANUEL A. GURDIAN c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. DOUGLAS LACKEY

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375 (404) 335-0747

599575