

ORIGINAL

Timolyn Henry

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]
Sent: Monday, August 29, 2005 3:36 PM
To: Filings@psc.state.fl.us
Subject: 050257-TL BellSouth's Proposed Issues
Importance: High
Attachments: 050257-T.pdf

A. Vicki Fatool
 Legal Secretary to Nancy B. White & Manuel A. Gurdian
 BellSouth Telecommunications, Inc.
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B. Docket No. 050257-TP

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

C. BellSouth Telecommunications, Inc.
on behalf of Nancy B. White

D. 4 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s Proposed Issues

pdf

<<050257-T.pdf>>

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Legal Department

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

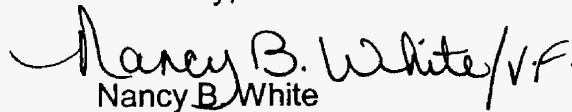
**Re: Docket No. 050257-TL: Complaint by BellSouth
Telecommunications, Inc., Regarding the Operation of a
Telecommunications Company by Miami-Dade County in Violation of
Florida Statutes and Commission Rules**

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,


Nancy B. White

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

DOCUMENT NUMBER-DATE

08276 AUG 29 05

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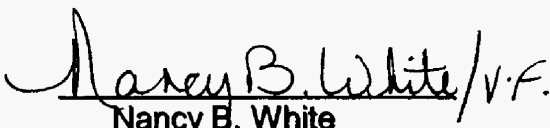
**CERTIFICATE OF SERVICE
Docket No. 050257-TP**

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
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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.

Handwritten signature of Nancy B. White in cursive, with a horizontal line drawn through it.

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

Handwritten signature of R. Douglas Lackey in cursive, with a horizontal line drawn through it.

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