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June 16, 2006

Ms. Blanca S. Bayo, Director  
Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

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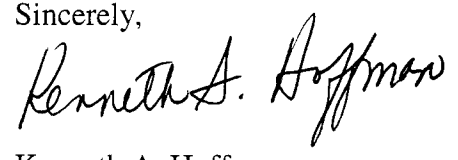
Re: Docket Nos. 060083-TP and 060296-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket on behalf of Northeast Florida Telephone Company ("Northeast Florida") are the original and fifteen copies of Northeast Florida Telephone Company d/b/a NEFCOM's Proposed Issues List.

Please acknowledge receipt of these documents by stamping the extra copy of this letter filed and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of Northeast Florida Telephone )  
Company d/b/a NEFCOM against South- )  
eastern Services, Inc. for failure to pay )  
intrastate access charges pursuant to )  
Northeast Florida's tariffs and for violation )  
of Section 364.16(3)(a), Florida Statutes. )  
\_\_\_\_\_ )

Docket No. 060083-TP

Referral by the Circuit Court of Baker )  
County, Florida to determine whether or not )  
Southeastern Services, Inc. is legally )  
responsible for payment to Northeast )  
Florida Telephone for originating intrastate )  
access charges under Northeast Florida )  
Telephone's Public Service Commission )  
approved tariff for the long distance calls )  
provided by Southeastern Services, Inc. as )  
as alleged in the Amended Complaint. )  
\_\_\_\_\_ )

Docket No. 060296-TP

Filed: June 16, 2006

**NORTHEAST FLORIDA TELEPHONE COMPANY D/B/A  
NEFCOM'S PROPOSED ISSUES LIST**

Northeast Florida Telephone Company, d/b/a NEFCOM, by and through its undersigned counsel, hereby files its Proposed Issues List for consideration at the Issues Identification Conference currently scheduled for June 21, 2006:

Issue 1: Are NEFCOM and SSI certificated by the Commission to provide telecommunications services?

a. If so, what types of certificates do these carriers hold from the Commission?

Issue 2: Are SSI and NEFCOM parties to a Resale Agreement dated September 22, 1999, setting forth the rates, terms and conditions by which SSI would purchase local telecommunications services from Northeast Florida for resale by SSI to SSI's end users?

Issue 3: What services did SSI order from NEFCOM pursuant to the Resale Agreement?

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FPSC-COMMISSION CLERK

- a. When were such services provided by NEFCOM to SSI?
- b. What services did SSI provide to its end user customers using each of the ADS-PRI lines ordered by SSI from NEFCOM under the Resale Agreement?
- c. How did SSI provide services to its end user customers using each of the ADS-PRI lines ordered by SSI from NEFCOM under the Resale Agreement and to what type of end users were such services provided?

Issue 4: Did SSI provide a flat rate long distance calling service to end users in Florida which enabled such end users to make long distance calls throughout the fifty states and Canada?

- a. If the answer is yes, over what period of time did SSI provide its flat rate long distance calling service?
- b. If the answer is yes, did SSI advertise or otherwise market the flat rate long distance calling service, when was such advertising or marketing conducted, and what was the content of such advertising or marketing?
- c. If the answer is yes, were customers who subscribed to SSI's flat rate long distance service required to purchase any other services from SSI, and, if so, what additional services were these customers required to purchase?

Issue 5: How did a typical SSI long distance customer originate a long distance call using SSI's flat rate long distance service?

Issue 6: With respect to the long distance calling service at issue:

- a. What facilities were involved in the origination, transmission and termination of the calls provided through SSI's long distance calling service?
- b. Was the manner in which SSI provided the flat rated long distance service using NEFCOM's facilities ordered pursuant to the Resale Agreement actually the same or functionally the same as Feature Group A access?
- c. What retail service was purchased by SSI's customers in connection with the long distance calling service at issue?

- d. What type of customer premises equipment did an SSI long distance customer require to originate a long distance call?
- e. Did SSI's long distance service originate and terminate on the public switch telephone network?
- f. Did SSI's long distance service undergo any net protocol conversion or provide any enhanced functionality to SSI's end users?

Issue 7: Is SSI's long distance service a "telecommunications service" or an "information service" as defined by federal law?

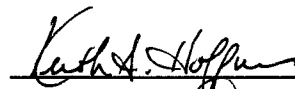
Issue 8: Did SSI breach NEFCOM's approved intrastate access tariff by failing to pay NEFCOM originating intrastate access charges for the use of NEFCOM's network in connection with SSI's long distance calling service?

Issue 9: What is the amount, if any, of intrastate originating access charges due from SSI to NEFCOM in connection with SSI's long distance calling service?

Issue 10: Has NEFCOM billed and has SSI paid intrastate originating access charges claimed to be due by NEFCOM in connection with SSI's long distance calling service?

Issue 11: What action should the Commission take in response to the Baker County Circuit Court's primary jurisdiction referral as set forth in the order entered by the court on February 28, 2006 in Northeast Florida Telephone Company v. Southeastern Services, Inc., Baker County Circuit Court Case No. 02-2003-CA-0141?

Respectfully submitted,



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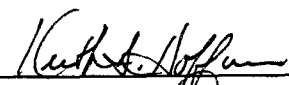
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by Telecopier and U.S. Mail to the following this 16<sup>th</sup> day of June, 2006:

Suzanne Fannon Summerlin, Esq.  
Suzanne Fannon Summerlin, P.A.  
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Tallahassee, FL 32309

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Office of the General Counsel  
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2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

  
\_\_\_\_\_  
Kenneth A. Hoffman, Esq.

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