

**ORIGINAL**

**Marguerite Lockard**

**From:** Keating, Beth [Beth.Keating@akerman.com]  
**Sent:** Friday, August 04, 2006 4:49 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket No. 060366-TP  
**Attachments:** 20060804173928172.pdf

Attached for filing in the above-referenced Docket, please find Supra Telecommunications and Information Systems, Inc.'s Preliminary List of Issues for Docket No. 060366-TP - Complaint Regarding BellSouth Telecommunications, Inc.'s failure to offer its promotional tariff offerings for resale and request for relief, by Supra Telecommunications and Information Systems, Inc. The total number of pages in this filing is 4. Should you have any questions, please do not hesitate to contact me.

Beth Keating  
Akerman Senterfitt  
106 East College Avenue, Suite 1200  
Tallahassee, FL 32301  
(850) 224-9634  
(850) 521-8002 (direct)  
beth.keating@akerman.com

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**Akerman Senterfitt**  
ATTORNEYS AT LAW

Fort Lauderdale  
Jacksonville  
Los Angeles  
Madison  
Miami  
New York  
Orlando  
Tallahassee  
Tampa  
Tysons Corner  
Washington, DC  
West Palm Beach

Suite 1200  
106 East College Avenue  
Tallahassee, FL 32301  
[www.akerman.com](http://www.akerman.com)  
850 224 9634 tel 850 222 0103 fax

August 4, 2006

**VIA HAND DELIVERY**

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

**Re: Docket NO. 060366-TP - COMPLAINT REGARDING BELLSOUTH'S FAILURE TO OFFER ITS PROMOTIONAL TARIFF OFFERINGS FOR RESALE AND REQUEST FOR RELIEF**

Dear Ms. Bayó:

Enclosed for filing on behalf of Supra Telecommunications and Information Systems, Inc. (Supra) is Supra's Preliminary List of Issues. Service has been made in accordance with the attached certificate.

Sincerely,

Beth Keating, Esquire  
**Akerman Senterfitt**  
106 East College Avenue, Suite 1200  
P.O. Box 1877 (32302)  
Tallahassee, Florida 32301  
(850) 521-8002  
Fax: (850) 222-0103  
[beth.keating@akerman.com](mailto:beth.keating@akerman.com)

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of: )  
Complaint of Supra Telecommunications )  
and Information Systems, Inc. regarding )  
BellSouth Telecommunications, Inc.'s )  
Failure to Offer Certain Promotional Tariff )  
Offerings for Resale in violation of the )  
Telecommunications Act of 1996. )

Docket No. 060366-TP  
Filed: August 4, 2006

Preliminary List of Issues


In accordance with Commission staff's request in its July 27, 2006, Memorandum to the Parties to this case, Supra Telecommunications and Information Systems, Inc. hereby respectfully submits the following list of issues, which it believes are appropriate and necessary for resolution in this proceeding:

1. Is BellSouth required to offer for resale the promotions at issue in this Docket in accordance with 47 U.S.C. § 251 (c)(4), Sections 364.161(2) and 364.162, Florida Statutes, and 47 C.F.R. § 51.613(b)?
2. Should BellSouth be required to discount a service that is provided for resale by an additional amount equivalent to the value of any promotion offered in conjunction with that service when it is provided on a retail basis?

Supra believes that these issues are legal questions that can be resolved through the briefing process. To the extent that there may be factual components (which Supra does not concede), Supra believes the facts are documented and susceptible to verification by alternative means that would negate the need for a full Section 120.57(1), F.S., hearing. Supra declines at this time to address the specific arguments raised by BellSouth Telecommunications, Inc. in its filing this same day, but respectfully reserves its right to address those arguments at the appropriate time.

Respectfully submitted this 4th day of August, 2006.

Supra Telecommunications and Information Systems, Inc.



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Beth Keating, Esquire  
Akerman Senterfitt  
106 East College Avenue, Suite 1200  
P.O. Box 1877 (32302)  
Tallahassee, Florida 32301  
(850) 521-8002  
Fax: (850) 222-0103  
beth.keating@akerman.com

Marva Brown Johnson, General Counsel  
Supra Telecommunications and Information  
Systems, Inc.  
2901 S.W. 149<sup>th</sup> Avenue, Suite 300  
Miramar, Florida 33027  
(786) 455-4209  
Fax: (786) 455-4600  
E-mail: Marva.Johnson@supratelecom.com

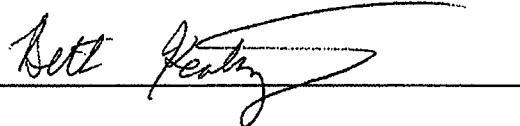
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via First Class Mail to James Meza c/o Nancy H. Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, FL 32301-1556, and that a copy has also been provided to the persons listed below this 4th day of August, 2006:

Kira Scott, Senior Attorney  
Florida Public Service Commission,  
Office of the General Counsel  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
KSCOTT@PSC.STATE.FL.US

E. Earl Edenfield Jr.  
J Phillip Carver (j.carver@bellsouth.com)  
BellSouth Center – Suite 4300  
675 West Peachtree Street, NE  
Atlanta, GA 30375

By:



Beth Keating  
Akerman Senterfitt  
106 East College Avenue, Suite 1200  
P.O. Box 1877 (32302)  
Tallahassee, Florida 32301  
(850) 521-8002  
Fax: (850) 222-0103  
beth.keating@akerman.com