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June 29, 1998

OF COUNSEL CHARLES F DUCLEY

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EVED-FPSC

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

> Re: Docket No. 980000B-SP; In re: Undocketed Special Project: Access by Telecommunications Companies to Customers in Multi-Tenant Environments

HAND DELIVERY

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc /TCG South Florida ("TCG") are the original and fifteen copies of TCG's Proposed List of Issues.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely, RECEIVED & FILED ACK AFA APP CAF CMU. KAH/rl CTR Enclosures EAG TEG Tob 3 LIN DOCUMENT NUMBER-DATE OPC RCH 06829 JUN 29 3 SEC FILE HELCHINS/ALTORITING WAS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Special Project: Access by Telecommunications Companies to Customers in Multi-Tenant Environments

Docket No. 980000B-SP

Filed: June 29, 1998

TELEPORT COMMUNICATIONS GROUP INC./ TCG SOUTH FLORIDA'S PROPOSED LIST OF ISSUES

Teleport Communications Group Inc. and its Florida affiliate, TCG South Florida (hereinafter referred to collectively as "TCG"), by and through its undersigned counsel, hereby submits TCG's Proposed List of Issues for resolution in this proceeding.

1. Whether the provision of non-discriminatory access by building owners, managers and landlords (referred to collectively as "building owners") to all local telecommunications service providers will allow building occupants,¹ the opportunity to choose the local telecommunications service provider of their choice and enjoy the benefits of local competition intended by Florida and federal law?

2. Whether the provision of non-discriminatory access by building owners to all local telecommunications service providers will enhance competition for local telecommunications services?

3. Whether the provision of non-discriminatory access by building owners to all local telecommunications service providers is in the public interest?

 Whether building owners should be permitted to impose fees or charges for the installation of facilities by local telecommunications service providers necessary to provide local

¹Building occupants include tenants, cooperative shareholders and condominium owners. DOCUMENT NUMBER - DATE

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telecommunications service and, if so, whether such charges must be non-discriminatory as to local telecommunications service providers and building occupants?

5. Whether the Florida Public Service Commission should be authorized to establish standard, non-discriminatory charges imposed by building owners on all providers of local telecommunications services to recover the cost of installation of telecommunications facilities?

6. Whether building owners may deny building occupants the right to choose the local telecommunications service provider of their choice by denying a local telecommunications service provider the ability to connect its telecommunications facilities to a potential customer's telephone line in the building's common space or by demanding excessive, discriminatory compensation from the local provider of choice?

7. Whether exclusive contracts between building owners and incumbent local exchange companies are in the public interest?

8. Whether any fee charged to a telecommunications service provider by the building owner may reflect more than the actual cost of providing access to the space required to install the telecommunications facilities needed by the occupant requesting service from a particular telecommunications service provider?

9. Whether building owners or managers should be permitted to discriminate in favor of any building occupant in the form of rent, fees or services provided, to induce that building occupant to obtain local telecommunications services from a particular provider of telecommunications services?

10. Anything about eminent domain/quick take?

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11. Should the Florida Legislature protect the rights of building occupants to choose the local telecommunications service provider of their choice by enacting legislation granting the power of eminent domain, through quick-take procedures, to all (including alternative) local exchange telecommunications service providers?

12. What action should be taken by the Florida Legislature to address the legal rights of building occupants to obtain service from the local telecommunications service provider of their choice?

Respectfully submitted,

KENNETH A. HOFFMAN, ESQ. JOHN R. ELLIS, ESQ. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, FL 32302 (850) 681-6788 (telephone) (850) 681-6515 (telecopier)

and

PAUL KOUROUPAS Teleport Communications Group Inc. TCG - Washington 2 Lafayette Centre 1133 Twenty First Street, N.W. Suite 400 Washington, DC 20036 (202) 739-0010 (telephone) (202) 739-0044 (telecopier)

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Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing was furnished by hand delivery to the following this 29th day of June, 1998 to the following:

Catherine Bedell, Esq. Senior Attorney Florida Public Service Commission 2540 Shumard Oak Boulevard Room 335-E-1, Gunter Building Tallahassee, Florida 32399-0850

Dan Hoppe Director of Research and Regulatory Review Florida Public Service Commission 2540 Shumard Oak Boulevard Room 390J-1, Gunter Building Tallahassee, Fl 32399-0850

By: IAN, ESQ.