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November 1, 2002

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Blanca Bayó Director, Division of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

121A-TP

Docket 000121-TP Re:

Dear Ms. Bayó:

Enclosed herewith for filing in the above referenced docket on behalf of the ALEC Coalition are the original and fifteen copies of its Comments Concerning Staff's Proposed Table of Agreed Issues.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning it to me. If you have any questions concerning this filing, please contact me at 850/425-2359.

Thank you for your assistance in connection with this matter.

Very truly yours,

GVP/jlm **Enclosures**

cc: Certificate of Service

DOCUMENT NI MBER-DATE

12017 NOV-18

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Docket No. 000121-TP
Establishment of Operations Support Systems Permanent Performance Filed: November 1, 2002
Measures for Incumbent Local Exchange Telecommunications Companies

ALEC COALITION'S COMMENTS CONCERNING STAFF'S PROPOSED TABLE OF AGREED ISSUES

The ALEC Coalition¹ hereby submits its comments concerning Staff's proposed Table of Agreed Issues dated October 22, 2002.

The Table of Agreed Issues seeks to capture the issues upon which the ALEC Coalition and BellSouth agreed at the workshops held in this docket on September 25 and 26, 2002 and October 17 and 18, 2002. The ALEC Coalition acknowledges that the Table of Agreed Issues accurately states the issues upon which the parties agreed. The ALEC Coalition notes that in some cases the agreement is stated in shorthand form, and that the substance of what was proposed and agreed upon must be determined by reference to the comments of the party that submitted the proposed change. The ALEC Coalition also would clarify the agreements with respect to the following items:

BellSouth Proposed Changes 52, 53, 55, 56, 68, 60-62 and 64-66: The ALEC Coalition agrees to the addition of the term "customer" in the SQM sections BellSouth proposes, but with the understanding that these changes will not result in the exclusion of

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FPSC-COMMISSION CLERK

¹ The members of the ALEC Coalition are AT&T Communications of the Southern States, Inc., WorldCom, Inc., DIECA Communications Company d/b/a Covad Communications Company, New South Communications Corp., Mpower Communications Corp., Xspedius Management Co., LLC. and ITC^DeltaCom Communications, Inc.

"no trouble found" or "found OK/test OK" situations, as the parties discussed at the October 17-18 workshop.

ALEC Proposed Change 14: The parties agreed that an independent SEEM audit is necessary. The ALEC Coalition simply would clarify that the audit's scope should be as outlined in the ALEC Coalition's August 30, 2002 comments.

Respectfully submitted, this ____ day of November, 2002.

The following carriers sponsor the above Comments as the "ALEC Coalition."

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 1st day of November, 2002.

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