JAMES MEZA III Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

March 26, 2003

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.: 021069-TP

Request for approval of adoption of language in existing interconnection agreement between NuVox and BellSouth to serve as an amendment to existing interconnection agreement between Supra and BellSouth

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Proposed Issues, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

James Meya III mas

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

DOCUMENT NUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for approval of adoption of)	
language in existing interconnection agreement)	DOCKET NO. 021069-TP
between NuVox Communications, Inc. (f/k/a)	
Trivergent Communications, Inc.) and BellSouth)	
Telecommunications, Inc. to service as)	
amendment to existing interconnection)	FILED: March 26, 2003
agreement between Supra Telecommunications)	
and Information Systems, Inc. and BellSouth)	

BELLSOUTH'S PROPOSED ISSUES

BellSouth Telecommunications, Inc. ("BellSouth") submits the following proposed issues:

- 1. Is Supra entitled to adopt the resale billing dispute provisions of the NuVox Interconnection Agreement pursuant to Section 252(i) of the Telecommunications Act of 1996 (the "Act") and 47 C.F.R. § 51.809(c)?
- 2. If the answer to Question 4 is yes, is Supra limited to applying the resale dispute provisions of the NuVox Agreement to its resale billings with BellSouth?
- 3. If the answer to Question 4 is yes, what related terms from the NuVox Interconnection Agreement must Supra adopt in addition to the language selected by Supra?
- 4. If the answer to Question 4 is yes, what is the expiration date of the Supra's adoption request? If the answer to this question is a date prior to the expiration date of the Supra/BellSouth present interconnection agreement, what language will govern billing disputes after that date?
- 5. If the answer to Question 4 is yes, what effect does Supra's bankruptcy filing and the bankruptcy court's orders regarding the submission and resolution of disputes have on Supra's adoption request?

6. If the answer to Question 4 is yes, what policy considerations, if any, should the Commission consider in determining whether Supra is entitled to adopt the resale billing dispute provisions of the NuVox Interconnection Agreement?

In addition, BellSouth submits that there are several procedural issues that must be resolved, including:

- 7. Is an expedited hearing procedure warranted in this matter?
- 8. Is the Florida Public Service Commission ("Commission") required to conduct a full evidentiary hearing pursuant to Section 120.57(1), Florida Statutes because there are disputed issues of fact?
- 9. Is the Commission required to implement a rule-making procedure or a generic proceeding in the event the Commission will be resolving policy issues of general applicability regarding the adoption of interconnection agreements, including sections contained in existing interconnection agreements?

Respectfully submitted this 26th day of March, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE Docket No. 021069-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 26th day of March, 2003 to the following:

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