Legal Department

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E. EARL EDENFIELD, Jr. General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0763

ORIGINAL

February 17, 2000

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

## Re: Petition for Arbitration Section 252(b) of a Resale Agreement Between BellSouth Telecommunications, Inc. and Atlantic Telecommunications Systems, Inc.

Dear Ms. Bayó:

**BellSouth** Enclosed original and fifteen copies of is an Telecommunications, Inc.'s Proposed Issues List. We ask that you file all of these items in the captioned docket.

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.

E. Earl Edenfield, Jr. (PW)

AFA APE cc: All Parties of Record A Marshall M. Criser III CM. R. Douglas Lackey CIR EAG Nancy B. White LEG RECEIVED & FILED MAS OPC RPR FPSC-BUREAU OF RECORDS SEC WAW OTH

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## CERTIFICATE OF SERVICE Petition for Arbitration of a Resale Agreement Between BellSouth Telecommunications, Inc. and Atlantic Telecommunications Systems, Inc.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail and (\*) Facsimile this 17th day of February, 2000 to the following:

Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Tel. No. (850) 413-6199

Jerry Stabler, President Atlantic Telecommunications Systems, Inc. 5849 Okeechobee Boulevard Suite 201 West Palm Beach, FL 33417-4352

John C. Dodge Cole, Raywid & Braverman, LLP 1919 Pennsylvania Avenue, N.W. Suite 200 Washington, DC 20006

E. Earl Edenfield, Jr.

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

In re:

Petition for Arbitration of a Resale Agreement Between BellSouth Telecommunications, Inc. and Atlantic Telecommunications Systems, Inc. Pursuant to the Telecommunications Act of 1996. Docket No. 992018-TP

Filed: February 16, 2000

## BELLSOUTH TELECOMMUNICATIONS, INC.'S PROPOSED ISSUES LIST

1. Under the Telecommunications Act of 1996, can Atlantic require BellSouth to include a provision in the Resale Agreement whereby BellSouth is precluded from offering service to consumers covered by an exclusive service arrangement with Atlantic?

2. In the event of a unauthorized change in local service (*i.e.*, slamming) by Atlantic, is BellSouth allowed to recover from Atlantic the costs BellSouth incurs in returning the slammed customer to the appropriate local service provider? If so, should the obligation be reciprocal?

Respectfully submitted this 16<sup>th</sup> day of February 2000.

NANCY B. WHITE MICHAEL P. GOGGIN Museum Tower 150 West Flagler Street Suite 1910 Miami, Florida 33130

R. DOUGLAS LACKEY E. EARL EDENFIELD General Attorneys Suite 4300, BellSouth Center 675 West Peachtree Street, N.E. Atlanta, GA 30375 (404) 335-0750

COUNSEL FOR BELLSOUTH TELECOMMUNICATIONS, INC.

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