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Via Hand Delivery

September 29, 2000

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

Re: Docket No. 000828-TP; Joint Issue List.

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and five (5) copies of the BellSouth Telecommunications, Inc.'s and Sprint Communications Company L.P.'s Joint Proposed Issues List for Issue ID.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Sincerely,

Charles J. Rehwinkel

CJR/tk

CTR ECR LEG OPC PAI

RGO

SER

OTH

Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)	
)	Docket No. 000828-TP
Petition of Sprint Communications Company L.P. for)	
Arbitration with BellSouth Telecommunications, Inc,)	
Pursuant to Section 252(b) of the Telecommunications)	
Act of 1996.)	Filed: September 29, 2000
)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S AND SPRINT COMMUNICATIONS COMPANY L.P.'S JOINT PROPOSED ISSUES LIST FOR ISSUE ID

BellSouth Telecommunications, Inc., ("BellSouth") and Sprint Communications Company,

- L.P. ("Sprint") file their Joint Proposed Issues List for the Issue ID scheduled in this proceeding for October 2, 2000.
- ISSUE 1: In the event that a provision of this Agreement or an Attachment thereto, and a BellSouth tariff provision cannot be reasonably construed to avoid conflict, should the provision contained in this Agreement prevail?
- ISSUE 2: RESOLVED.
- ISSUE 3: Should BellSouth make its Custom Calling features available for resale on a standalone basis?
- Pursuant to Federal Communications Commission ("FCC") Rule 51.315(b), should BellSouth be required to provide Sprint at TELRIC rates combinations of UNEs that BellSouth typically combines for its own retail customers, whether or not the specific UNEs have already been combined for the specific end-user customer in question at the time Sprint places its order?
- ISSUE 5: Should the Commission require BellSouth to provide access to packet switching UNEs under the circumstances specified in the FCC's UNE Remand Order?
- ISSUE 6: Should BellSouth be required to universally provide access to EELs that it ordinarily and typically combines in its network at UNE rates?
- ISSUE 7: In situations where an ALEC's end-user customer is served via unbundled switching and is located in density zone 1 in one of the top fifty Metropolitan

DOCUMENT NUMBER-DATE

Statistical Areas ("MSAs") and who currently has three lines or less, adds additional lines, should BellSouth be able to charge market-based rates for all of those lines?

- ISSUE 8: Should BellSouth be able to designate the network Point of Interconnection ("POI") for delivery of BellSouth's local traffic?
- ISSUE 9: Should the parties' Agreement contain language providing Sprint with the ability to transport multi-jurisdictional traffic over the same trunk groups, including access trunk groups?
- ISSUE 10: Should Internet Service Provider ("ISP") bound traffic be included in the definition of "local traffic" for purposes of reciprocal compensation under this Agreement?
- ISSUE 11: Where Sprint's switch serves a geographic area comparable to the area served by BellSouth's tandem switch, should the tandem interconnection rate apply to local traffic terminated to Sprint?
- ISSUE 12: Should voice-over-Internet ("IP telephony") traffic be included in the definition of "Switched Access Traffic"?
- ISSUE 13: RESOLVED.
- ISSUE 14: RESOLVED.
- ISSUE 15: RESOLVED.
- ISSUE 16: Regarding multiple requests for collocation space availability reports on specific BellSouth central offices, what is the appropriate time interval in which BellSouth must provide such reports to Sprint?
- ISSUE 17: RESOLVED.
- ISSUE 18: Should Sprint and BellSouth have the ability to negotiate a demarcation point different from Sprint's collocation space, up to and including the conventional distribution frame?
- ISSUE 19: RESOLVED.
- ISSUE 20: RESOLVED.
- ISSUE 21: Are there situations where Sprint should be permitted to convert in place when transitioning from a virtual collocation arrangement to a cageless physical collocation arrangement? If so, under what situations?

- ISSUE 22: Should Sprint be required to pay the entire cost of make-ready work prior to BellSouth's satisfactory completion of the work?
- ISSUE 23: Should the Agreement contain a provision stating that if BellSouth has provided its affiliate preferential treatment for products or services as compared to the provision of those same products or services to Sprint, then the applicable standard (i.e., benchmark or parity) will be replaced for that month with the level of service provided to the BellSouth affiliate?
- ISSUE 24: What is the appropriate level of geographic disaggregation for performance measurement reporting to Sprint?
- ISSUE 25: What performance measurement audit provision(s) should be included in the Agreement?
- ISSUE 26: Should the availability of BellSouth's VSEEM III remedies proposal to Sprint, and the effective date of VSEEM III, be tied to the date that BellSouth receives interLATA authority in Florida?
- ISSUE 27: Should BellSouth be required to apply a statistical methodology to the SQM performance measures provided to Sprint?
- ISSUE 44(a): Is BellSouth required to provide two-way trunks to Sprint and use two-way trunks for BellSouth's traffic?
- ISSUE 44(b): Should BellSouth be allowed to designate a virtual point of interconnection in a BellSouth local calling area to which Sprint has assigned a Sprint NPA/NXX? If so, who pays for the transport and multiplexing, if any, between the virtual point of interconnection and the point of interconnection?
- ISSUE 44(c): Should the jurisdiction of a call be determined by the originating and terminating points of the call, regardless of how the phone numbers are assigned within an NPA/NXX? [Concurrence Tentative]
- ISSUE 44(d): Should Sprint be required to deliver switched access traffic to BellSouth for termination only over Sprint ordered switched access trunks and facilities?
- ISSUE 46(a): Upon denial of a Sprint request for physical collocation, what justification should BellSouth be required to provide to Sprint, if any, for BellSouth's reserved space at the requested premises?
- ISSUE 46(b): In the event that obsolete unused equipment is removed from a BellSouth premise, who should bear the cost of such removal?

ISSUE 48: Upon denial of a Sprint request for physical collocation, and prior to the walkthrough, should BellSouth be required to provide full-sized (24 inch x 36

inch) engineering floor plans and engineering forecasts for the premises in

question?

ISSUE 55: What rate(s) should BellSouth be allowed to charge for space preparation?

Respectfully submitted this 29th day of September 2000.

NANCY B. WHITE

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