Marguerite McLean

From:Ann Bassett [abassett@lawfla.com]Sent:Monday, June 29, 2009 2:09 PMTo:Filings@psc.state.fl.usSubject:Docket No. 090258-TPAttachments:2009-06-29, 090258, dPi's Issue List.pdf

The person responsible for this electronic filing is:

Norman H. Horton, Jr. Messer, Caparello & Self, P.A. P.O. Box 15579 Tallahassee, FL 32317 (850) 222-0720 nhorton@lawfla.com

Docket No. 090258-TP - Complaint by DPI-Teleconnect, L.L.C. against BellSouth Telecommunications, Inc. for dispute arising under interconnection agreement This filing is being made on behalf of dPi Teleconnect, L.L.C.

Total Number of Pages is 4

dPi Teleconnect, L.L.C.'s Issues List

Ann Bassett Messer, Caparello & Self, P.A. 2618 Centennial Place (32308) P.O. Box 15579 Tallahassee, FL 32317 Direct Phone: 850-201-5225 Fax No. 850-224-4359 Email Address: <<u>abassett@lawfla.com</u>> Web Address: <<u>www.lawfla.com</u>>

> DOCUMENT NUMBER-DATE 06493 JUN 298 FPSC-COMMISSION CLERK

6/29/2009



MESSER CAPARELLO & SELF, P.A.

Attorneys At Law

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June 29, 2009

BY ELECTRONIC MAIL

Ms. Ann Cole Commission Clerk Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 090258-TP

Dear Ms. Cole:

Enclosed for filing on behalf of dPi Teleconnect, L.L.C. is an electronic version of dPi's Issue List in the above referenced docket.

Thank you for your assistance with this filing.

Sincerely yours,

Norman H. Horton, Jr.

NHH/amb Enclosures cc: Chris Malish, Esq. Mr. Greg Follensbee

DOCUMENT NUMBER-CAT!

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Regional Center Office Park / 2618 Centennial Place / Tallahassee, Florida 32308 Mailing Address: P.O. Box 15579 / Tallahassee, Florida 32317 Main Telephone: (850) 222-0720 / Fax: (850) 224-4359

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by dPI Teleconnect, LLC) against BellSouth Telecommunications, Inc.) d/b/a AT&T Florida for dispute arising) under interconnection agreement)

Docket No. 090258-TP Date Filed: June 29, 2009

dPi's ISSUE LIST

TO THE HONORABLE UTILITIES COMMISSION:

dPi Teleconnect, L.L.C. identifies the following issues to be determined in this case:

- (1) whether AT&T/BellSouth will be required to follow federal law and made to extend promotional pricing to dPi for various services provided by BellSouth that were the subject of BellSouth retail promotions, and if so
- (2) the amount of any credits/refunds that dPi's might be entitled to as a consequence of being initially overcharged for services that should have been charged at promotional prices.

The promotions involved are designated by BellSouth as Cash Back \$100 Two Features -

C2TF; Cash Back \$100 Discount Complete Choice \$100; and Cash Back \$50 2 Pack Plan (PAMA6) - CBP6.

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Respectfully submitted,

Foster Malish Blair & Cowan, L.L.P. 1403 West Sixth Street Austin, Texas 78703 (512) 476-8591/ (512) 477-8657/fax

By Christopher Malish

State Bar No. 00791164 Attorney for dPi Teleconnect, L.L.C.

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HORTON, JR., ESQ. NORMA Η

Attorneys for dPi Teleconnect, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of June, 2009, a true and correct copy of the foregoing was served via electronic mail to the following:

Lee Eng Tan, Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>ltan@psc.state.fl.us</u>

Nancy Pruitt Florida Public Service Commission Competitive Markets and Enforcement Division 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 npruitt@psc.state.fl.us

Manuel A. Gurdian, Jr., Esq. c/o Mr. Gregory Follensbee AT&T Florida Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 greg.follensbee@att.com

Norman H. Horton,