

T. Michael Twomey
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BellSouth Telecommunications, Inc.
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September 20, 2001

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. 001305-TP (Supra-BellSouth Arbitration)

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s and Supra Telecommunications and Information Systems, Inc.'s Joint Request for Clarification of Issue A, which we ask that you file in the above-referenced 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,

T. Michael Twomey
T. Michael Twomey (KAG)

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

DOCUMENT NUMBER-DATE

11826 SEP 20 01

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 001305-TP

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

Federal Express this 20th day of September, 2001 to the following:

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T. Michael Twomey (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of the Interconnection)	
Agreement Between BellSouth Telecommunications,)	Docket No. 001305-TP
Inc. and Supra Telecommunications & Information)	
System, Inc., Pursuant to Section 252(b) of the)	Filed: September 20, 2001
Telecommunications Act of 1996.)	
)	

JOINT REQUEST FOR CLARIFICATION OF ISSUE A

BellSouth Telecommunications, Inc. ("BellSouth") and Supra Telecommunications and Information Systems, Inc. ("Supra"), hereby file this joint request for clarification of Issue A.

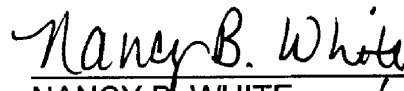
At the beginning of this arbitration, the parties asked this Commission to resolve approximately sixty-six issues identified in BellSouth's Petition for Arbitration and Supra's Response to that petition. In addition, the Commission identified an additional issue – Issue A – to resolve Supra's claims that BellSouth acted in bad faith. Among the claims that Supra made was its claim that BellSouth acted in bad faith when it refused to agree to use the parties' existing agreement as the basis for negotiating the Follow-On Agreement. The description of Issue A in the Draft Pre-Hearing Order, however, limits Issue A to:

Has BellSouth or Supra violated the requirement to Commission Order PSC-01-1180-FOF-TI to negotiate in good faith pursuant to Section 252(b)(5) of the Act? If so, should BellSouth or Supra be fined \$25,000 for each violation of Commission Order PSC-01-1180-FOF-TI, for each day of the period May 29, 2001 through June 6, 2001?


The parties disagree over which agreement template will be used as the base agreement into which the Commission's decisions on the disputed issues will be incorporated. The parties agree that, in addition to resolving the disputed issues, the Commission must also decide which base agreement will be used. Because the scope of Issue A does not expressly include this issue, the Commission should direct the parties to include in their post-hearing briefs a discussion of this issue. It is the parties' expectation that the Commission will decide this issue when it issues a final order in this docket. The parties believe it is important for the Commission to decide this question because, without an order from the Commission on this point, the parties will be unable to submit a final agreement for approval in accordance with 47 U.S.C. § 252.

Respectfully submitted this 20th day of September, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



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