

**Richard A. Chapkis**  
Vice President & General Counsel –  
Southeast Region



201 North Franklin St., FLTC0717  
P.O. Box 110  
Tampa, FL 33601

Phone: 813-483-1256  
Fax: 813-204-8870  
[richard.chapkis@verizon.com](mailto:richard.chapkis@verizon.com)

November 24, 2004 – *VIA ELECTRONIC MAIL*

Ms. 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. 041170-TP  
Complaint Against Verizon Florida Inc. and Request for Declaratory Ruling  
By Bright House Networks Information Services, LLC (Florida)

Dear Ms. Bayó:

Enclosed is Verizon Florida Inc.'s Issues List for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

/s Richard A. Chapkis

Richard A. Chapkis

RAC:tas  
Enclosures

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the Verizon Florida Inc.'s Issues List in Docket No. 041170-TP were sent via U.S. mail on November 24, 2004 to the parties on the attached list.

/s Richard A. Chapkis

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Richard A. Chapkis

Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Beth Salak  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Christopher W. Savage  
Danielle Frappier  
Cole Raywid & Braverman  
1919 Pennsylvania Ave. NW  
Suite 200  
Washington, DC 20006

Bright House Networks  
Information Services LLC  
301 East Pine Street  
Suite 600  
Orlando, FL 32801

Bright House Networks  
Information Services LLC  
Arthur Orduna  
5000 Campuswood Drive  
East Syracuse, NY 13057

FDN Communications  
Matthew Feil  
2301 Lucien Way  
Suite 200  
Maitland, FL 32751

Florida Cable Telecomm. Assn.  
Michael A. Gross  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303

AT&T  
Tracy Hatch  
101 N. Monroe Street, Suite 700  
Tallahassee, FL 32301

AT&T  
Lisa A. Sapper  
1230 Peachtree Street, NE  
4<sup>th</sup> Floor  
Atlanta, GA 30309

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Bright House Networks Information Services,  
LLC (Florida),

Complainant,

v.

Verizon Florida Inc.,

Defendant.

Docket No. 041170-TP

**VERIZON FLORIDA INC.'S ISSUES LIST**

Verizon Florida Inc. ("Verizon") respectfully submits the following list of issues raised by the Complaint and Request for Declaratory Ruling filed by Bright House Networks Information Services, Inc. ("Bright House").

1. Whether the Commission should await the FCC's resolution of the BellSouth Declaratory Ruling proceeding before devoting resources to Bright House's Complaint.
2. Whether the Commission has jurisdiction to determine the terms and conditions under which Verizon must offer DSL transmission for Internet access.
3. Whether the Commission has jurisdiction to determine the terms and conditions under which Verizon Online, an unregulated Verizon affiliate, must offer interstate information services such as DSL-based Internet access.
4. Whether the voice service that Bright House is providing is a form of VoIP service that is within the exclusive authority of the FCC.

5. Whether consumers have choices other than Verizon broadband services, so that if Verizon chooses not to offer service in a particular instance, the competitive market would protect consumers.

6. Whether Bright House's cable affiliate can and does provide broadband Internet access to consumers that receive voice service from Bright House. If so, under what terms and conditions is such access offered?

7. Whether Bright House is being harmed by the Verizon policy it challenges.

8. Whether there are operational and administrative issues that currently prevent compliance with Bright House's demands in this case. If so, whether Verizon is taking steps to try to address those operational and administrative issues.

9. Whether the relief that Bright House seeks would negatively affect competitive DSL providers.

10. Whether the issues raised by Bright House in this docket would be more appropriately raised through the CLEC User Forum ("CUF"), so that all affected parties can be heard and appropriate resolutions worked out.

11. Whether Verizon is entitled to contact the end user to determine if the end user still wants DSL, is willing to pay more for it, and will accept credit card billing.

12. Whether and to what extent Bright House can document delays allegedly associated with Verizon's porting policy.

Respectfully submitted,

s/ Richard A. Chapkis

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Richard A. Chapkis  
Attorney for Verizon Florida Inc.  
201 N. Franklin St., FLTC0717  
Tampa, FL 33601  
(813) 483-1256  
(813) 273-9825

Counsel for Verizon Florida Inc.

November 24, 2004