

**Diamond Williams**

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**From:** Kim Hancock [khancock@kagmlaw.com]  
**Sent:** Tuesday, October 25, 2011 4:12 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Lee Eng Tan; manuel.gurdian@att.com; Vicki Gordon Kaufman  
**Subject:** Docket No. 110071-TP  
**Attachments:** Express Phone Preliminary Issue List 10.25.11.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number and email for the person responsible for the filing is:

Vicki Gordon Kaufman  
Keefe Anchors Gordon & Moyle  
118 North Gadsden Street  
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b. This filing is made in Docket No. 110071-TP.

c. The document is filed on behalf of is EXPRESS PHONE SERVICE, INC.

d. The total pages in the document are 3 pages.

e. The attached document is EXPRESS PHONE SERVICE, INC.'S PRELIMINARY ISSUE LIST.

Kim Hancock  
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DOCUMENT NUMBER DATE

07864 OCT 25 =

10/26/2011

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Emergency Complaint of  
Express Phone Service, Inc.  
against BellSouth Telecommunications,  
Inc. d/b/a AT&T Florida Regarding  
Interpretation of the Parties'  
Interconnection Agreement

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DOCKET NO. 110071-TP

Filed: October 25, 2011

**EXPRESS PHONE SERVICE, INC.'S PRELIMINARY ISSUE LIST**

Pursuant to Staff's request, Express Phone Service, Inc. files its Preliminary Issue List attached hereto as Exhibit A.

s/ Vicki Gordon Kaufman

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Attorneys for Express Phone Service, Inc.

DOCUMENT NUMBER-DATE

07864 OCT 25 =

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of Express Phone Service, Inc.'s Preliminary Issue List has been furnished by Electronic Mail and U.S. Mail to the following, this 25<sup>th</sup> day of October 2011:

Lee Eng Tan  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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s/ Vicki Gordon Kaufman  
Vicki Gordon Kaufman

**Express Phone Service, Inc.'s Proposed Issues**  
**Docket No. 110071-TP**

1. What promotional offerings are at issue in this docket?
2. Which of the promotional offerings in Issue No. 1 are subject to the avoided cost discount?
3. If the avoided cost discounts must be provided on some or all of the offerings in Issue No. 2, how should such discounts be calculated and applied?
4. Is AT&T required to provide Express Phone with the full value of some or all of the offerings identified in Issue 1?
5. Is Express Phone entitled to a waiver of the line connect charge?
6. Based on the determination of Issues 1-5 above, what is the amount due from AT&T to Express Phone or from Express Phone to AT&T?

Exhibit A