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March 23, 2001

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

RECEIVED-FPSC  
01 MAR 23 AM 10:25  
RECORDS AND REPORTING

Re: Docket No. 001810-TP

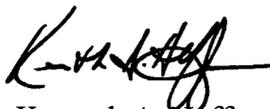
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of TCG South Florida and Teleport Communications Group ("TCG") are the original and fifteen copies of TCG's Proposed Issues.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

APP KAH/rl  
CAF Enclosures  
CMP cc: All Parties of Record  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
LEG I  
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SEC I  
SER \_\_\_\_\_  
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DOCUMENT NUMBER-DATE

03706 MAR 23 01

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of TCG South Florida and )  
Teleport Communications Group for ) Docket No. 001810-TP  
Enforcement of Interconnection Agreement )  
with BellSouth Telecommunications, Inc. ) Filed: March 23, 2001  
\_\_\_\_\_ /

**TCG'S PROPOSED ISSUES**

TCG South Florida and Teleport Communications Group ("TCG"), by and through undersigned counsel, and pursuant to the Memorandum issued by the Staff of the Florida Public Service Commission on March 14, 2001 in reference to the above captioned complaint, hereby submits the following proposed issues for hearing and decision by the Commission in this proceeding:

- Issue 1: Does this Commission's September 15, 1998 Order<sup>1</sup> requiring BellSouth to pay TCG for transport and termination of calls to Internet Service Providers ("ISPs") apply to and control the interpretation and application of the BellSouth/TCG Agreement?
- Issue 2: Under the BellSouth/TCG Agreement, are the parties required to compensate each other for delivery of traffic to ISPs?
- Issue 3: Has BellSouth breached the BellSouth/TCG Agreement by failing to pay TCG reciprocal compensation for the transport and termination of Local Traffic as defined in the BellSouth/TCG Agreement, including calls originated by BellSouth's end-user customers and transported and terminated by TCG to ISPs?

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<sup>1</sup>In re: Complaint of Teleport Communications Group Inc./TCG South Florida against BellSouth Telecommunications, Inc. for breach of terms of interconnection agreement under Section 252 of the Telecommunications Act of 1996, and request for relief, Order No. PSC-98-1216-FOF-TP, Docket No. 980184-TP, issued September 15, 1998 ("TCG Order").

DOCUMENT NUMBER-DATE

03706 MAR 23 2001

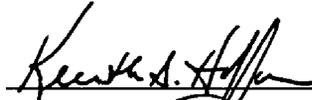
FPSC-RECORDS/REPORTING

(a) If so, should AT&T be allowed to charge BellSouth the tandem interconnection rate for local traffic?

Issue 4: Has BellSouth breached the BellSouth/TCG Agreement by failing to pay TCG switched access charges for telephone exchange service provided by TCG to BellSouth?

(a) If so, should AT&T be allowed to charge BellSouth tandem switching and common transport for originating and terminating switched access charges for intraLATA toll traffic?

Respectfully submitted,



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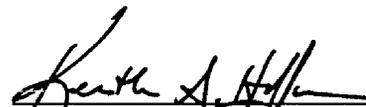
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail and Telecopier (\*) or Hand Delivery (\*\*) this 23rd day of March, 2001 to the following:

Nancy B. White, Esq. (\*)  
James Meza, III, Esq. (\*)  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 N. Monroe Street, Suite 400  
Tallahassee, FL 32301

Patricia Christensen, Esq. (\*\*)  
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Kenneth A. Hoffman, Esq.