Legal Department

ORIGINAL

Christine M. Peirano Attorney

BellSouth Telecommunications, Inc. 150 West Flagler Street Suite 1910 Miami, Florida 33130 Phone: (305) 347-5332 Fax: (305) 375-0209

October 18, 1999

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Dear Ms. Bayo:

BellSouth Telecommunications, Inc. requests that Michael P. Goggin, General Attorney, be named a qualified representative of BellSouth in the docket(s) listed below.

Docket No. 991534-TP

Mr. Goggin is located 150 West Flagler Street, Suite 1910, Miami, Florida 33130, telephone number (305) 347-5561. BellSouth is aware that it can be represented by counsel as defined in Rule 28-106.106 and has chosen otherwise.

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Sincerely,

Christine M. Peirano Florida Bar No. 863998

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AFFIDAVIT

Undersigned counsel, being first duly sworn, states that:

Undersigned counsel is currently employed by BellSouth Telecommunications, Inc., as General Attorney, at the address and telephone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent BellSouth's interests in Docket No. 991534-TP.

Undersigned counsel is an attorney admitted to practice, and a member in good standing of the District of Columbia, Bar No. 25299 and state of Virginia, Bar No. 30866; has practiced extensively before other utility regulatory agencies or authorities; has knowledge of the Florida Statutes relative to the Commission's jurisdiction; has knowledge of the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; has knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; has acquired or will acquire knowledge of the factual and legal issues in this matter; and has knowledge of and compliance with the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.

Michael P. Goggin General Attorney 150 West Flagter Street Suite 1910 Miami, FL 33130 (305) 347-5561

State of Florida County of Dade

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