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PLEASE REPLY TO:

TALLAHASSEE

ORIGINAL

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

September 11, 2000

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RECORDS AND REPORTING

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 990649-TP

Dear Ms. Bayo:

On behalf of BlueStar Networks, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Request for Representation by Qualified Representative, Michael B. Bressman and,
- ▶ Request for Representation by Qualified Representative, Norton Culter.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

Vicki Gordon Kaufman

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[Handwritten initials and marks next to each category]

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEIN, P.A.

Done 9/13/00

DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE

11264 SEP 11 8 11265 SEP 11 8

FPSC-RECORDS/REPORTING FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into
Pricing of Unbundled Network
Elements

Docket No. 990649-TP
Filed: September 11, 2000

REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE

BlueStar Networks, Inc. (BlueStar), through its undersigned counsel, submits its Request for Representation by a Qualified Representative pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. BlueStar is a certified alternative local exchange carrier and provides service in the state of Florida. BlueStar is located at 5 Corporate Centre, 801 Crescent Centre Drive, Suite 600, Franklin, Tennessee 37067.

2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request for Representation should be served upon the following individual:

Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden
Tallahassee, Florida 32301
(850)222-2525 (telephone)
(850)222-5606 (fax)

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that BlueStar submit a written request to the presiding officer in the event that BlueStar elects to be represented before the Commission by a qualified representative. BlueStar hereby submits such a request.

4. BlueStar seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of BlueStar for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 990649-TP.

Michael B. Bressman
Associate General Counsel
BlueStar Networks, Inc.
5 Corporate Centre
801 Crescent Centre Drive, Suite 600
Franklin, Tennessee 37067
615-778-7350 (telephone)
615-778-7354 (fax)

5. Consistent with Rule 25-106.106(2)(b), BlueStar hereby affirms that it is aware of the services Mr. Bressman can provide and, further, that BlueStar can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, BlueStar has elected to be represented in this matter by other attorneys in addition to Mr. Bressman.

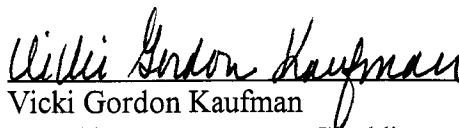
6. BlueStar submits that Mr. Bressman possesses the necessary qualifications to responsibly represent BlueStar's interests in this matter. In this regard, Mr. Bressman's qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Bressman's affidavit, he: (i) is an attorney admitted to practice in the Tennessee, Georgia and the District of Columbia; (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction; (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding.

8. Consistent with the standard set forth in Rule 28-106.107, Mr. Bressman has acquired

or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of BlueStar is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, BlueStar Networks, Inc. requests that Mr. Bressman be permitted to appear as a qualified representative on behalf of BlueStar Networks, Inc.



Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
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117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525
Telecopy: (850) 222-5606

Attorneys for BlueStar Networks, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Request for Representation by a Qualified Representative, has been furnished by hand delivery (*) or U.S. Mail, this 11th day of September, 2000, to:

(*)Beth Keating
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Messer, Caparello & Self
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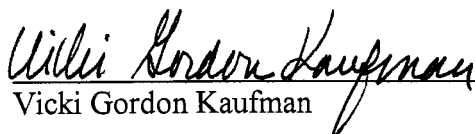
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Tallahassee, FL 32316-2214

Mark E. Buechele
Post Office Box 398555
Miami Beach, Florida 33239


Vicki Gordon Kaufman

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:

Investigation into pricing of
unbundled network elements.

Docket No. 990649-TP

Filed: September 11, 2000

AFFIDAVIT OF MICHAEL B. BRESSMAN

STATE OF TENNESSEE)
COUNTY OF WILLIAMSON)

I, Michael B. Bressman, being first duly sworn, do hereby depose and state as follows:

1. I am Associate General Counsel, with BlueStar Networks, Inc., 5 Corporate Centre, 801 Crescent Centre Drive, Suite 600, Franklin, Tennessee 37067.

2. I am a member in good standing of the Bars of Tennessee, Georgia and the District of Columbia Bar and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.

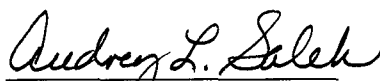
3. I have served as Associate General Counsel to BlueStar Networks, Inc. in proceedings before state commissions. Moreover, I have assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.

4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

I declare that the foregoing is true and correct based on my knowledge, information, and belief.


MICHAEL B. BRESSMAN

SWORN TO AND SUBSCRIBED before me this 8th day of September, 2000, by Michael Bressman, who () is personally known to me; or () who has presented _____ as identification.


Notary Public, State of TN, County of Williamson
Commission Number:
My Commission expires: 3-24-01