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NEW YORK, NY 10174

September 15, 2000

VIA FEDERAL EXPRESS

Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

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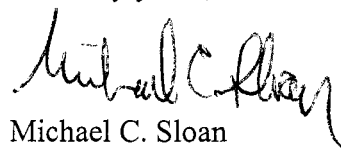
Re: Response to Staff's Second Set of Interrogatories and Second Request for Production of Documents of Broadslate Networks, Inc., Cleartel Communications, Inc., and Florida Digital Network, Inc. in Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find an additional 25 copies of both The Coalition's Motion for Leave to Late File Discovery Responses to Staff and the Response to Staff's Second Set of Interrogatories and Second Request for Production of Documents in Docket No. 990649-TP of Broadslate Networks, Inc., Cleartel Communications, Inc. and Florida Digital Network, Inc. (the "Coalition").

Please feel free to contact me if you have any questions or require further information.

Sincerely yours,



Michael C. Sloan
Counsel for the Coalition

Enclosures

Forwarded CMP/Ollala

ORIGINAL

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

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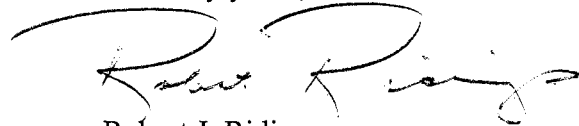
Re: Request for Representation by a Qualified Representative of The Coalition in
Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find one original and forty copies of The Coalition's Request for Representation by a Qualified Representative. Please date stamp and return the extra copy to us in the enclosed self addressed, postage paid envelope.

Please feel free to contact me if you have any questions or require further information.

Sincerely yours,



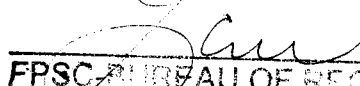
Robert J. Ridings
(Not Admitted to Practice in the
District of Columbia)

Enclosures

cc: All Parties of Record
John Spilman
Hope G. Colantonio
Mike Gallagher

APP _____
CAF _____
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

Done 9/20/00

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of) Docket No. 990649-TP
Unbundled Network Elements)
_____) Filed: September 15, 2000

REQUEST FOR REPRESENTATION
BY A QUALIFIED REPRESENTATIVE

Broadslate Networks of Florida, Inc., Cleartel Communications, Inc. and Florida Digital Network, Inc. (collectively, "The Coalition"), 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. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that The Coalition submit a written request to the presiding officer in the event that The Coalition elects to be represented before the Commission by a qualified representative. The Coalition hereby submits such a request.

2. The Coalition seeks leave of the presiding officer for the individuals identified below to appear as qualified representatives on behalf of The Coalition for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 990649-TP.

Thomas R. Lotterman
Michael C. Sloan
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007-5116
Telephone: 202/424-8458
Facsimile: 202/424-7643


3. Consistent with Rule 28-106.106(2)(b), The Coalition hereby affirms that it is aware of the services Mssrs. Lotterman and Sloan can provide and further, that The Coalition can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1). Indeed, The Coalition has elected to be represented in this matter by other attorneys in addition to Mssrs. Lotterman and Sloan.

4. The Coalition submits that Mssrs. Lotterman and Sloan possess the necessary qualifications to responsibly represent The Coalition’s interest in this matter. In this regard, Mssrs. Lotterman’s and Sloan’s qualifications are set forth in the attached affidavits.

5. As reflected in Mssrs. Lotterman’s and Sloan’s affidavits, they: (i) are attorneys admitted to practice in the District of Columbia; (ii) have reviewed those portions of the Florida Statutes relative to the Commission’s jurisdiction, (iii) have reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) have 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.

6. Consistent with the standard set forth in Rule 28-106.107, Mssrs. Lotterman and Sloan have acquired or will acquire actual knowledge of the factual and legal issues involved insofar as their representation of The Coalition is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, The Coalition requests that Messrs. Lotterman and Sloan be permitted to appear as qualified representatives on behalf of The Coalition.

A handwritten signature in black ink, appearing to read "Michael C. Sloan", written over a horizontal line.

Michael C. Sloan
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007-5116
Telephone: 202/424-8458
Facsimile: 202/424-7643

Counsel for The Coalition

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**


In re: Investigation into Pricing of)	Docket No. 990649-TP
Unbundled Network Elements)	
<hr/>)	Filed: September 15, 2000

AFFIDAVIT FOR MICHAEL C. SLOAN

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

1. I am an attorney with Swidler Berlin Shereff Friedman, LLP.
2. I am a member in good standing of 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 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.

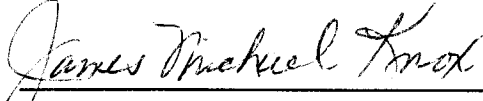


Michael. C. Sloan

The District of Columbia)

BEFORE ME, the undersigned Notary Public, on this day personally appeared Michael C. Sloan, who, being my duly sworn on his oath, deposed and said that he has executed the foregoing instrument and that the statements contained therein are true and correct to the best of her knowledge, information and belief.

SUBSCRIBED AND SWORN TO BEFORE ME on this the 15th day of September, 2000, to certify which, witness my hand and official seal of office.



Notary Public in and for the District
of Columbia

My Commission expires:

JAMES MICHAEL KNOX
Notary Public District of Columbia
My Commission Expires: 02/28/2005

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into Pricing of)	Docket No. 990649-TP
Unbundled Network Elements)	
_____)	Filed: September 15, 2000

AFFIDAVIT FOR THOMAS R. LOTTERMAN

I, Thomas R. Lotterman, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with Swidler Berlin Shereff Friedman, LLP.
2. I am a member in good standing of 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 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.

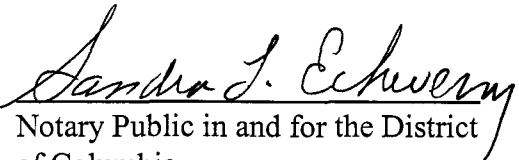


Thomas R. Lotterman

The District of Columbia)

BEFORE ME, the undersigned Notary Public, on this day personally appeared Thomas R. Lotterman, who, being my duly sworn on his oath, deposed and said that he has executed the foregoing instrument and that the statements contained therein are true and correct to the best of her knowledge, information and belief.

SUBSCRIBED AND SWORN TO BEFORE ME on this the 15th day of September, 2000, to certify which, witness my hand and official seal of office.


Notary Public in and for the District
of Columbia

My Commission expires: 12/14/2001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via first class mail on the following parties on this 15th day of September, 2000.

Beth Keating
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

ALLTEL Communications Services, Inc.
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Little Rock, AR 72203-2177

AT&T Communications of the Southern
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Jim Lamoureux, Esq.
1200 Peachtree St., Suite 8068
Atlanta, GA 30309

AT&T Communications of the Southern
States, Inc.
Ms. Marsha Rule
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Tallahassee, FL 32301-1549

Ausley Law Firm
Jeffrey Wahlen
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BellSouth Telecommunications, Inc.
Ms. Nancy B. White
c/o Nancy H. Sims
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Tallahassee, FL 32301-1556

BlueStar Networks, Inc.
Norton Cutler/Michael Bressman
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Nashville, TN 37210

Blumenfeld & Cohen
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Washington DC 20036

Blumenfeld & Cohen
Elise Kiely/Jeffrey Blumenfeld
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Washington, DC 20036

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Atlanta, GA 30328

e.spire Communications
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Florida Competitive Carriers Assoc.
c/o McWhirter Law Firm
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Florida Public Telecommunications Assoc.
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Mr. Brian Sulmonetti
Concourse Corporate Center
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Sterling, VA 20164

Office of Public Counsel
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c/o The Florida Legislature
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Tallahassee, FL 32399-1400

Pennington Law Firm
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Atlanta, GA 30339

Sprint-Florida, Incorporated
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1313 Blairstone Road
Tallahassee, FL 32301-3021

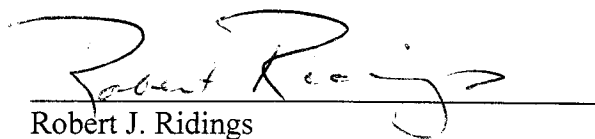
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Robert J. Ridings