

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of BellSouth Telecommunications, Inc.
for declaratory statement concerning whether
requested provision of telecommunications
service to Sprint PCS in Macclenny, Florida,
which is not in BellSouth's exchange service,
violates BellSouth's General Subscriber Service
Tariff for the state of Florida.

Docket No. 020415-TL

Filed: July 30, 2002

REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE

Nextel Communications, Inc. (Nextel), 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. Nextel is a certified Commercial Mobile Radio Service (CMRS) provider and provides service in the State of Florida. Nextel is located at 2001 Edmund Halley Drive, Room No. A 4017B, Reston, Virginia 20191

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, 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 Nextel submit a written request to the presiding officer in the event that Nextel elects to be represented before the Commission by a qualified representative. Nextel hereby submits such a request.

DOCUMENT NUMBER 020415-TL

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FLORIDA PUBLIC SERVICE COMMISSION CLERK

4. Nextel seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of Nextel for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 020415-TL

Laura H. Phillips
Drinker Biddle & Reath LLP
1500 K Street, Suite 1100
Washington, DC 20005-1209
202-842-8891 (telephone)
202-842-8465 (fax)
lphillips@dbrr.com

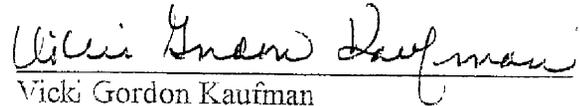
5. Consistent with Rule 25-106.106(2)(b), Nextel hereby affirms that it is aware of the services Ms. Phillips can provide and, further, that Nextel can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, Nextel has elected to be represented in this matter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

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

7. As reflected in Ms. Phillips' affidavit, she: (i) is an attorney admitted to practice in 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, Ms. Phillips has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Nextel is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, Nextel requests that Ms. Phillips be permitted to appear as a qualified representative on behalf of Nextel.



Vicki Gordon Kaufman
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Decker Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525
Telecopy: (850) 222-5606

Attorneys for Nextel Communications, Inc.

CERTIFICATE OF SERVICE

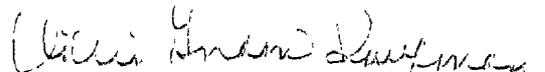
I HEREBY CERTIFY that a true and correct copy of Nextel's Request for Representation by a Qualified Representative has been furnished by (*) hand delivery or U. S. Mail this 30th day of July, 2002 to the following:

(*) Martha Carter Brown
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy White
James Meza
BellSouth Telecommunications, Inc.
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Susan Masterton
Sprint
Post Office Box 2214
Mail Stop: FLTLH00107
Tallahassee, Florida 32316-2214

Monica Barone
Sprint
6391 Sprint Parkway
Mail Stop: KSOPHT0101-Z2060
Overland Park, Kansas 66251


Vicki Gordon Kaufman

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Tariff for the state of Florida.

Docket No. 020415-TZ

Filed: July 30, 2002

AFFIDAVIT OF LAURA H. PHILLIPS

DISTRICT OF COLUMBIA)

I, Laura H. Phillips, being first duly sworn, do hereby depose and state as follows:

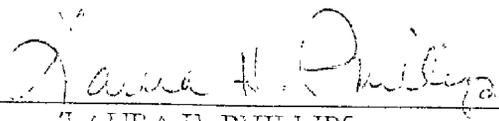
1. I am a partner with the law firm of Drinker Biddle & Reath, LLP, 1500 K Street NW, Suite 1100, Washington, DC 20005-1209.

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 served as regulatory counsel to Nextel Communications, Inc. in proceedings before both the Federal Communications Commission and 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.

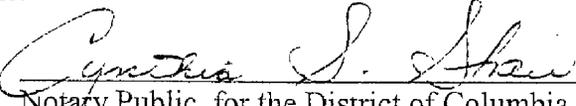
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

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



LAURA H. PHILLIPS

SWORN TO AND SUBSCRIBED before me this 29th day of July, 2002 by Laura Phillips, who (X) is personally known to me.


Notary Public, for the District of Columbia
My Commission expires: July 31, 2002