

ORIGINAL

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August 7, 2003

Ms. Blanca S. Bayo, Director  
Division of Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED FPSC  
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COMMISSION  
CLERK

Re: Docket No. 981834-TP  
Petition of Competitive Carriers for Commission Action to Support Local  
Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP  
Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic  
investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida,  
Incorporated, and GTE Florida Incorporated comply with obligation to provide  
alternative local exchange carriers with flexible, timely, and cost-efficient  
physical collocation

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s  
Motion for Leave to File Direct Testimony of Charles Bailey together with an original  
and 15 copies of the Direct Testimony of Charles Bailey on behalf of Verizon Florida  
Inc. in the above matters. Service has been made as indicated on the Certificate of  
Service. If there are any questions regarding this filing, please contact me at  
813-483-1256.

Sincerely,

*Richard A. Chapkis*

Richard A. Chapkis

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
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RAC:tas  
Enclosures

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07295 AUG-8 8

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for  
Commission action to support local  
Competition in BellSouth Telecommunications  
Inc.'s service territory

Docket No. 981834-TP  
Filed: August 7, 2003

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation

Docket No. 990321-TP

**MOTION OF VERIZON FLORIDA INC. FOR LEAVE  
TO FILE DIRECT TESTIMONY OF CHARLES BAILEY**

Pursuant to Rule 28-106.204 of the Florida Administrative Code and Rule 1.100 of the Florida Rules of Civil Procedure, Verizon Florida Inc. (“Verizon”), by and through its undersigned counsel, hereby submits this Motion for Leave to File Direct Testimony of Charles Bailey. Pursuant to Rule 28-106.204(3), Verizon has conferred with the other parties to this proceeding regarding this motion; none objected.

As the Commission properly noted in its Prehearing Order, Verizon witness Charles Bailey will represent Verizon at the August hearing and will adopt the Direct Testimony and Rebuttal Testimony filed in this docket by John Ries on behalf of Verizon. See Order No. PSC-03-0894-PHO-TP, issued in Docket Nos. 981834-TP and 990321-TP on August 4, 2003, at 8 n.2. The testimony attached to this motion offered by Charles Bailey contains (1) biographical information and (2) the formal adoption of John Ries's Direct Testimony and Rebuttal Testimony. It does not contain any new arguments or evidence or seek to shift any of Verizon's established positions in any

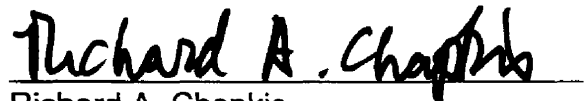
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FPSC-COMMISSION CLERK

way, but instead is offered simply to make a record of Mr. Bailey's qualifications and his adoption of Mr. Ries's testimony in advance of the August hearing.

Because no party will be prejudiced by allowing Verizon to file the attached testimony, and because the interest of efficiency will be advanced by making this record prior to the August hearing, Verizon respectfully requests that the Commission grant this Motion for Leave to File Direct Testimony of Charles Bailey, and order that the attached testimony be filed in Docket Nos. 981834-TP and 990321-TP.

Respectfully submitted,

A handwritten signature in black ink that reads "Richard A. Chapkis". The signature is written in a cursive style and is positioned above a horizontal line.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and U.S. mail on August 7, 2003 to the parties on the attached list.

  
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