

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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REPORTING

In the Matter of: )  
)  
)  
Petition by ICG TELECOM GROUP, INC. )  
for Arbitration of an Interconnection )  
Agreement with BELLSOUTH )  
TELECOMMUNICATIONS, INC. Pursuant to )  
Section 252(b) of the Telecommunications )  
Act of 1996. )  
\_\_\_\_\_ )

Docket No. 990691-TP

Filed: September 7, 1999

ICG TELECOM GROUP, INC.'S REQUEST FOR ORAL ARGUMENT

ICG Telecom Group, Inc. (ICG), pursuant to rule 28-106.204, Florida Administrative Code, requests that the Commission grant oral argument on ICG's Motion to Strike. As grounds therefor, ICG states:

1. In rebuttal testimony filed by BellSouth Telecommunications, Inc. (BellSouth), BellSouth witness Alphonso J. Varner raises an issue that was never raised by BellSouth during negotiations or during the pleadings that frame and limit the issues to be arbitrated.
2. As set forth more fully in ICG's Motion to Strike, such an attempt to inject this new issue is beyond the scope of this proceeding, in violation of the Telecommunications Act of 1996.
3. Oral argument will assist the Commission in understanding and evaluating ICG's Motion to Strike.

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 APP \_\_\_\_\_  
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**WHEREFORE**, ICG requests that the Commission grant oral argument on its Motion to Strike.

  
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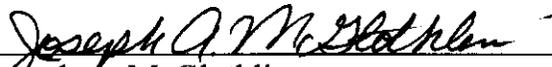
Attorneys for ICG Telecom Group, Inc.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the ICG Telecom Group, Inc.'s Request for Oral has been furnished by (\*)hand delivery and by U.S. mail to the following this 7<sup>th</sup> day of September, 1999:

\*Lee Fordham  
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Division of Legal Services  
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\_\_\_\_\_  
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