

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 991391

PILGRIM TELEPHONE, INC.

V.

PETITIONER'S REQUEST FOR REPRESENTATION
BY A QUALIFIED REPRESENTATIVE

BELLSOUTH TELECOMMUNICATIONS, INC.

PETITIONER
RECEIVED-FPSC
OCT 15 PM 12:39
RECORDS AND REPORTING
RESPONSE

Pilgrim Telephone Company ("Pilgrim") hereby requests that the presiding officer of the Public Service Commission who will hear Docket number 991391 permit James H. Newberry, Jr. and Russell D. Lukas to be Pilgrim's authorized representatives in this proceeding. Pilgrim is aware that it may be represented by an attorney licensed in Florida at its own expense and has chosen otherwise. James H. Newberry, Jr.'s address and telephone number is:

250 W. Main Street
Suite 1700
Lexington, KY 40507
(606) 288-7621

Russell D. Lukas' address and telephone number is:

1111 19th St. NW Suite 1200
Washington, D.C. 20036
(202) 857-3500

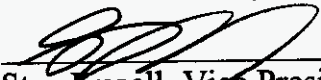
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- SEC 1
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FPSC-RECORDS/REPORTING

Respectfully submitted,



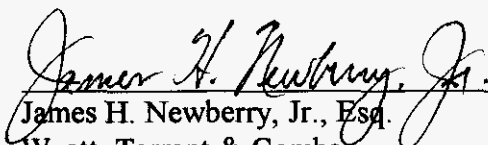
Stan Kugell, Vice President
Pilgrim Telephone, Inc.
Building 600, Suite 450
One Kendall Square
Cambridge, MA 02139

30163217.1

AFFIDAVIT

I, James H. Newberry, Jr., having been duly sworn, state as follows:

1. I am an attorney licensed to practice and in good standing in the Commonwealth of Kentucky.
2. I am familiar with the law of Florida, including the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding.
3. I am familiar with the Florida Rules of Evidence, including the concept of hearsay in an administrative proceeding.
4. I am familiar with the factual and legal issues involved in the Pilgrim arbitration proceedings against BellSouth.
5. I have read, am familiar with, and intend to follow the Standards of Conduct for Qualified Representatives.


James H. Newberry, Jr., Esq.
Wyatt, Tarrant & Combs
250 W. Main Street, Suite 1700
Lexington, KY 40507
(606) 288-7621

STATE OF KENTUCKY)
)
COUNTY OF FAYETTE)

Subscribed and sworn to before me by James H. Newberry, Jr., this 13th day of October, 1999.

My Commission Expires: Nov. 25, 2001


NOTARY PUBLIC

AFFIDAVIT

I, Russell D. Lukas, having been duly sworn, state as follows:

1. I am an attorney licensed to practice and in good standing in the District of Columbia.
2. I am familiar with the law of Florida, including the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding.
3. I am familiar with the Florida Rules of Evidence, including the concept of hearsay in an administrative proceeding.
4. I am familiar with the factual and legal issues involved in the Pilgrim arbitration proceedings against BellSouth.
5. I have read, am familiar with, and intend to follow the Standards of Conduct for Qualified Representatives.



Russell D. Lukas, Esq.
1111 19th St. NW Suite 1200
Washington, D.C. 20036
(202) 857-3500

DISTRICT OF COLUMBIA)
)

Subscribed and sworn to before me by Russell D. Lukas, this 14th day of October, 1999.

CATHERINE M. SEYMOUR

My Commission Expires: _____
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires June 14, 2000



NOTARY PUBLIC