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COMMISSION



Kimberly Caswell

Vice President and General Counsel, Southeast Legal Department

FLTC0007 201 North Franklin Street (33602) Post Office Box 110 Tampa, Florida 33601-0110

Phone 813 483-2606 Fax 813 204-8870 kimberly caswell@verizon com

June 4, 2002

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

Re: Docket No. 011666-TP

Petition by Global NAPS, Inc. for arbitration pursuant to 47 U.S.C. 252(b) of interconnection, rates, terms and conditions with Verizon Florida Inc.

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and 15 copies of a Joint Stipulation to Suspend Arbitration Schedule and Applicable Statutory Deadlines. Service has been made as indicated on the Certificate of Service. If there are any questions concerning this filing, please contact me at (813) 483-2617.

Sincerely,

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Kimberly Caswell

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Enclosures

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FPSC-BUREAU OF RO 5830 JUN-48

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Global NAPs, Inc.)	Docket No. 011666-TP
for arbitration pursuant to 47 U.S.C.		Filed: June 4, 2002
252(b) of interconnection rates, terms and		
conditions with Verizon Florida Inc.		
	_)	

JOINT STIPULATION TO SUSPEND ARBITRATION SCHEDULE AND APPLICABLE STATUTORY DEADLINES

WHEREAS, Global NAPs, Inc. ("GNAPs") filed a Petition for Arbitration of an Interconnection Agreement with Verizon Florida Inc. ("Verizon") on December 20, 2001;

WHEREAS. Verizon filed its Response to GNAPs' Petition for Arbitration on January 16, 2002;

WHEREAS, the Florida Public Service Commission ("Commission") issued a March 29, 2002 Order Establishing Procedure;

WHEREAS, the parties filed their respective direct testimony on May 8, 2002;

WHEREAS. Verizon served its First Set of Interrogatories and First Set of Requests for Production of Documents to GNAPs on April 17, 2002, for which GNAPs provided Objections and Responses on May 2, 2002;

WHEREAS, a number of arbitration issues overlap with issues under consideration in Docket No. 000075-TP;

WHEREAS, the parties anticipate issuance of a written order in Docket No. 000075-TP in September 2002; and

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WHEREAS, the parties agreed to extend the applicable statutory deadlines for

Commission resolution of a Petition for Arbitration, as reflected in the jointly filed April

2. 2002 correspondence ("Specifically, the parties now agree that the Commission may

render its decision on or before January 13, 2003").

The parties hereby agree and stipulate as follows:

The parties agree to suspend the arbitration schedule as set forth in the 1.

March 29, 2002 Order Establishing Procedure pending issuance of a written order in

Docket No. 000075-TP.

Within 30 days after the issuance of a written order in Docket No. 000075-2.

TP, the parties agree to jointly move for issuance of a Revised Order Establishing

Procedure in order to proceed with the arbitration, allowing for (i) supplemental direct

testimony and exhibits, (ii) rebuttal testimony and exhibits, (iii) prehearing statement, (iv)

prehearing conference, (v) hearing, and (vi) post-hearing briefs.

The parties agree that either party may proceed with discovery after filing 3.

the joint motion for issuance of a Revised Order Establishing Procedure, and pending its

revision may proceed with discovery in accordance with the currently prescribed CASR

as it may be revised pursuant to the parties' joint motion. The parties agree that they may

use previous responses to discovery, move to compel responses to previous discovery

requests, seek updated responses to previous discovery requests, and serve additional

discovery.

DATED: June 3, 2002

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Respectfully submitted.

GLOBAL NAPS, INC.

VERIZON FLORIDA INC.

JOHN C. DODGE

DAVID N. TOBENKIN

Cole, Raywid & Braverman, L.L.P. 1919 Pennsylvania Ave., N.W., 2nd Floor

Washington, D.C. 20006

Tel: (202) 659-9750 Fax: (202) 452-0067

Email: <u>jdodge/a crblaw.com</u> dtobenkin/a crblaw.com

JON C. MOYLE

Florida Bar No. 0727016

Moyle Flanigan Katz

Raymond & Sheehan P.A.

118 North Gadsden Street

Tallahassee, FL 32301

Tel: (850) 681-3828

Fax: (850) 681-8788

Email: jmoylejr@moylelaw.com

WILLIAM J. ROONEY, JR.

Vice President and General Counsel

Global NAPs, Inc. 89 Access Road

Norwood, MA 02062

Tel: (781) 551-9707

Fax.: (781) 551-9984

Email: wroonev@gnaps.com

JAMES R. J. SCHELTEMA

Director - Regulatory Affairs

Global NAPs, Inc.

5042 Durham Road West

Columbia, MD 21044

Tel: (617) 504-5513

Fax.: (617) 507-5713

Email: jscheltema@gnaps.com

KIMBERLY CASWELL

Attorney for Verizon Florida Inc.

P.O. Box 110. FLTC0007

Tampa, FL 33601-0110

Phone: (813) 483-2617

Fax: (813) 223-4888

DAVID K. HALL

Attorney for Verizon

1515 North Court House Road

Fifth Floor

Arlington, Virginia 22201

(703) 351-3100

KELLY L. FAGLIONI

Hunton & Williams

Riverfront Plaza, East Tower

951 East Byrd Street

Richmond, VA 23219

Tel: 804-788-8721

Fax: 804-788-8218

Email: kfaglioni@hunton.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Joint Stipulation to Suspend Arbitration Schedule and Applicable Statutory Deadlines in Docket No. 011666-TP were sent via U. S. mail on June 4, 2002 to the following:

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

John C. Dodge, Esq.
David N. Tobenkin, Esq.
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W., 2nd Floor
Washington, DC 20006

Jon C. Moyle, Esq.
Moyle Flanigan Katz Raymond & Sheehan P.A.
118 North Gadsden Street
Tallahassee, FL 32301

William J. Rooney, Jr., Esq.
Vice President and General Counsel
Global NAPS, Inc.
89 Access Road
Norwood, MA 02062

James R. J. Scheltema Director-Regulatory Affairs Global NAPs, Inc. 5042 Durham Road West Columbia, MD 21044

Kelly L. Faglioni, Esq. Edward P. Noonan, Esq. Hunton & Williams Riverfront Plaza, East Tower 951 E. Byrd Street Richmond, VA 23219-4074

Clubry Silvery Caswell