

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
Global NAPS, INC.)
Petition for Arbitration Pursuant to)
47 U.S.C. §252(b) of Interconnection) Docket No. 011354-TP
Rates, Terms and Conditions with) Filed October 10, 2001
Alltel - Florida)
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**MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR
ON BEHALF OF GLOBAL NAPS, INC.**

Pursuant to Rules 28-106.106 and 28-106.204, Florida Administrative Code (F.A.C.)
Global NAPS, Inc., respectfully moves the Commission to enter an Order designating Laura G.
Schloss, Esquire, as a Qualified Representative authorized to appear in the above-styled matter
on behalf of Global NAPS, Inc. The grounds for this motion are as follows:

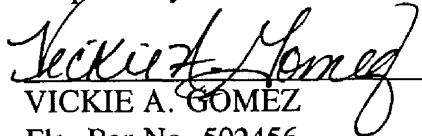
1. Ms. Schloss is admitted to practice law in the District of Columbia.
2. Ms. Schloss has practiced law for three years and is knowledgeable concerning telecommunications law, the nature of these proceedings, and the applicable law. Due to her experience in the practice of law, she is familiar with the rules of evidence. She is also knowledgeable of the Florida Rules of Civil Procedure and the applicable rules of evidence in administrative proceedings in Florida, including the admissibility of, and weight given hearsay evidence. Furthermore, she is knowledgeable with respect to the factual and legal issues in this proceeding. She will comply with the standards of conduct set forth in Rule 28-106.107, F.A.C. Please see the affidavit attached as Exhibit A.

DOCUMENT NUMBER-DATE
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3. The law firm of Moyle, Flanigan, et al., in conjunction with having Ms. Schloss authorized to appear in the proceeding as a Qualified Representative, will work to ensure that Global NAPs, Inc., is well represented in the above-styled matter.

WHEREFORE, Global NAPs, Inc., respectfully requests the entry of an Order authorizing Ms. Schloss to appear in this proceeding as Qualified Representative for Global NAPs, Inc.

Respectfully submitted,



VICKIE A. GOMEZ

Fla. Bar No. 502456

MOYLE FLANIGAN KATZ

RAYMOND & SHEEHAN, P.A.

118 North Gadsden Street

Tallahassee, FL 32301

(850) 681-3828

LAURA G. SCHLOSS

COLE, RAYWID, & BRAVERMAN, L.L.P.

1919 Pennsylvania Avenue, N.W.

Washington, D.C. 20006

(202) 828-9883

CERTIFICATE OF SERVICE

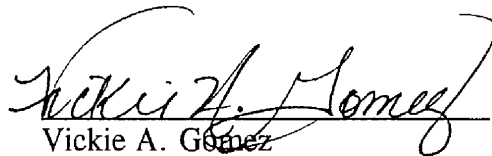
I HEREBY CERTIFY that a true and correct copy of the foregoing MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR ON BEHALF OF GLOBAL NAPS, INC. was furnished by U.S. Mail, this 31st day of January, 2002 to:

Stephen T. Refsell
Vice President - Law
ALLTEL Corporate Services
One Allied Drive
Little Rock, AR 72202

Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue, S.E.
Live Oak, FL 32060-3357

J. Jeffry Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

David Dowds
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399


Vickie A. Gomez

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AFFIDAVIT IN SUPPORT OF
MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR
ON BEHALF OF GLOBAL NAPS, INC.

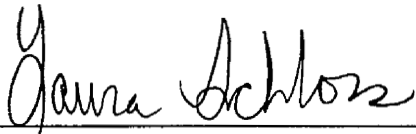
BEFORE ME, this day personally appeared Laura G. Schloss, who being duly sworn, deposes and says that the following information is true and correct, and within her personal knowledge.

1. Ms. Schloss is admitted to practice law in the District of Columbia and has practiced law for three years.
2. Ms. Schloss is knowledgeable of the law pertaining to the jurisdiction of the Public Service Commission over this proceeding and with respect to other relevant jurisdictional issues.
3. Ms. Schloss is knowledgeable regarding to the Florida Rules of Civil Procedure applicable to discovery in this proceeding.
4. Ms. Schloss is knowledgeable regarding the applicable rules of evidence in administrative proceedings in Florida, including the admissibility of, and weight given, hearsay evidence.

5. Ms. Schloss is knowledgeable with respect to the factual and legal issues in this proceeding.

6. Ms. Schloss is knowledgeable with respect to, and will comply with, the Standards of Conduct Applicable to Qualified Representatives set forth in Rule 28-106.107, Florida Administrative Code.

FURTHER AFFIANT SAYETH NAUGHT.

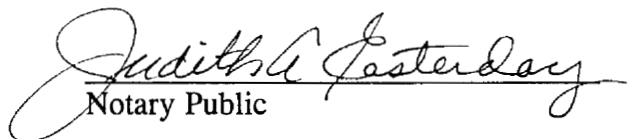


Laura G. Schloss

~~STATE OF~~
~~COUNTY OF~~ District of Columbia

Sworn to and subscribed before me by Laura G. Schloss this 30th day of January, 2002.

She is personally known to me yes, OR she has produced _____ as identification.


Notary Public

Judith A. Easterday
(Print Name)

Judith A. Easterday
Notary Public, District of Columbia
My Commission Expires 6-14-04

NOTARY STAMP