BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)	
Enforcement of an Interconnection)	Docket No. 020099-TP
Agreement Between ALEC, Inc. and)	Filed August 8, 2002
Sprint-Florida, Inc.)	
)	
)	

MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR ON BEHALF OF ALEC, INC.

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

- 1. Mr. Dodge is admitted to practice law in Maine, Massachusetts, and the District of Columbia.
- 2. Mr. Dodge has practiced law for approximately sixteen (16) years and is knowledgeable concerning the telecommunications law, the nature of these proceedings, and the applicable law. Due to his extensive experience in the practice of law he is familiar with the rules of evidence. He will comply with the standards of conduct set forth in Rule 28-106.107, F.A.C.
- 3. The law firm of Moyle, Flanigan, et al., in conjunction with having Mr. Dodge authorized to appear in the proceeding as a Qualified Representative, will ensure that ALEC, Inc., is well represented in the above-styled matter.

WHEREFORE, ALEC, Inc., respectfully requests the entry of an Order authorizing Mr. Dodge to appear in this proceeding as Qualified Representative for ALEC, Inc.

08371 AUG-88 FPSC-COMMISSION CLERK

Respectfully submitted,

Jon C. Moyle, Jr.

Florida Bar No. 727016

Moyle, Flanigan, Katz, Raymond & Sheehan, P.A.

118 North Gadsden Street Tallahassee, Florida 32301 (850) 681-3828

John Dodge Cole, Raywid, & Braverman, L.L.P. 1919 Pennsylvania Avenue, N.W. Washington, D.C. 20006 (202) 659-9750

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served by U.S. Mail on this 8th day of August, 2002, to the following:

Susan S. Masterton, Esquire Charles R. Rehwinkel Sprint-Florida, Incorporated 1313 Blairstone Road Tallahassee, Florida 32301

Mr. F. B. "Ben" Poag Director, Regulatory Affairs Sprint-Florida, Incorporated 1313 Blairstone Road Tallahassee, Florida 32301

Linda H. Dodson, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Tobey Schultz, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Jon C. Moyle, Jr.