

HUNTON  
WILLIAMS

RIVERFRONT PLAZA, EAST TOWER  
951 EAST BYRD STREET  
RICHMOND, VIRGINIA 23219-4074

TEL 804 • 788 • 8200  
FAX 804 • 788 • 8218

KELLY L FAGLIONI  
DIRECT DIAL 804 • 788 • 7334  
EMAIL KFAGLIONI@HUNTON.COM

October 9, 2002

FILE NO 56423 000310

**Via UPS - Next Day Delivery**

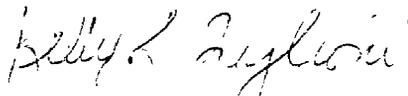
Ms. Blanca S. Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**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 Motion for a New Arbitration Schedule. Service has been made as indicated on the Certificate of Service. If there are any questions concerning this filing, please contact me at (804) 788-7334.

Sincerely,



Kelly L. Faglioni,

KLF/ar  
Enclosures  
cc: Service List (e-mail & overnight mail)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Joint Motion for a New Schedule in Docket No. 011666-TP were sent via UPS – Next Day Delivery service on October 9, 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.  
2<sup>nd</sup> Floor  
Washington, DC 20006

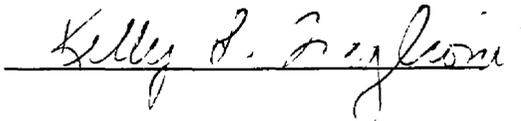
Jon C. Moyle, Esq.  
Moyle Flanigan Katz Raymond &  
Sheehan P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301

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

Kimberly A. Caswell, Esq.  
Verizon  
201 North Franklin Street  
16th Floor - Legal Department  
Tampa, FL 33602

David K. Hall, Esq.  
Verizon  
1515 North Court House Road  
Suite 500  
Arlington, VA 22201-2009

  
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**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF FLORIDA**

In the Matter of )  
Global NAPs, Inc. )  
Petition for Arbitration of an )  
Interconnection Agreement with )  
Verizon Florida Inc. ) Docket No. 011666-TP  
F/K/A GTE Florida, Inc. )  
Pursuant to Section 252(b) of the )  
Telecommunication Act of 1996 )

**JOINT MOTION FOR A NEW ARBITRATION SCHEDULE**

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, the parties jointly agreed and stipulated to suspend the arbitration schedule as set forth in the March 29, 2002 Order Establishing Procedure pending issuance of a written order in Docket No. 000075-TP;

WHEREAS, the Commission issued an Order Suspending Proceedings on June 10, 2002;

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WHEREAS, the Commission issued a written order in Docket No. 000075-TP on September 10, 2002;

WHEREAS, the Commission directed the parties to jointly move the Commission to set new controlling dates for this arbitration within thirty days of the issuance of a written order in Docket No. 000075-TP:

The parties hereby jointly move the Commission to set new controlling dates allowing for (i) testimony and exhibits, (ii) pre-hearing statements, (iii) a pre-hearing conference, (iv) a hearing, and (v) post-hearing briefs.

DATED: October 10, 2002

Respectfully submitted,

GLOBAL NAPS, INC.

VERIZON FLORIDA INC.

By: Janus Scheltema  
*with permission by K&T*  
JOHN C. DODGE  
DAVID N. TOBENKIN  
Cole, Raywid & Braverman, L.L.P.  
1919 Pennsylvania Ave., N.W., 2<sup>nd</sup> Floor  
Washington, D.C. 20006  
Tel: (202) 659-9750  
Fax: (202) 452-0067  
Email: [jdodge@crblaw.com](mailto:jdodge@crblaw.com)  
[dtobenkin@crblaw.com](mailto:dtobenkin@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](mailto:jmoylejr@moylelaw.com)

By: Kelly L. Faglioni  
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

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: [wrooney@gnaps.com](mailto:wrooney@gnaps.com)

Fax: 804-788-8218  
Email: [kfaglioni@hunton.com](mailto:kfaglioni@hunton.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](mailto:jscheltema@gnaps.com)