

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:
Global NAPS SOUTH, INC.
Petition for Arbitration Pursuant to
47 U.S.C. §252(b) of Interconnection
Rates, Terms and Conditions with
Alltel - Florida

Docket No. 011354-7
Filed January 3, 2003

COMMISSION
CLERK

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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 James R. J. Scheltema, 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. Mr. Scheltema is admitted to practice law in Maryland.
2. Mr. Scheltema has practiced law for thirteen 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, Katz, Raymond, & Sheehan, P.A., in conjunction with having Mr. Scheltema authorized to appear in the proceeding as a Qualified Representative, will ensure that Global NAPS, Inc., is well represented in the above-styled

matter.

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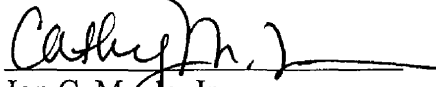
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FPSC-COMMISSION CLERK

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

Respectfully submitted,



Jon C. Moyle, Jr.

Fla. Bar No. 727016

Cathy M. Sellers

Fla. Bar No. 0784958

Moyle Flanigan Katz Raymond & Sheehan, P.A.

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James R. J. Scheltema, Esq.

Director, Regulatory Affairs

Global Naps, Inc.

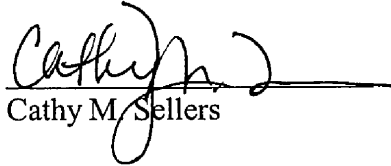
5042 Durham Road West

Columbia, MD 21044-1455

(617) 504-5513

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 served by U.S. Mail (*) and by hand delivery (**) to the following persons this 3rd day of January, 2003.


Cathy M. Sellers

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