

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

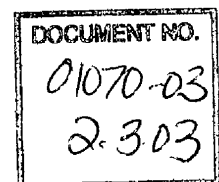
Docket No. 011666-TP  
Filed: February 3, 2003

**MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR  
ON BEHALF OF GLOBAL NAPS SOUTH, INC.**

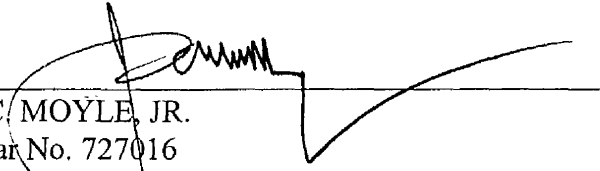
Pursuant to Rules 28-106.106 and 28-106.204, Florida Administrative Code (F.A.C.), Global NAPS South, Inc. respectfully moves the Commission to enter an Order designating James R. J. Scheltema, Esquire as a Qualified Representative authorized to appear in the above-styled matter on behalf of Global NAPS South, 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 13 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 South, Inc. is well represented in the above-styled matter.

WHEREFORE, Global Naps South, Inc., respectfully requests the entry of an Order authorizing James R. J. Scheltema to appear in this proceeding as Qualified Representative for Global Naps South, Inc.



Respectfully submitted,



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JON C. MOYLE, JR.

Fla. Bar No. 727016

CATHY M. SELLERS

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*Attorneys for Global Naps South, Inc.*

**CERTIFICATE OF SERVICE**

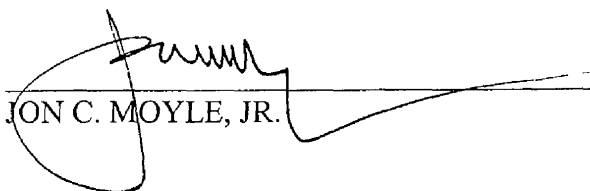
I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery and electronic mail to those listed below with an asterisk (“\*”) and by U.S. Mail to those listed below without an asterisk on this 3<sup>rd</sup> day of February, 2003:

Lee Fordham, Esquire\*  
Florida Public Service Commission  
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Tallahassee, Florida 32399-0850

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JON C. MOYLE, JR.