

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Allegiance Telecom of Florida, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection and Resale Agreement with BellSouth Telecommunications, Inc. Under the Telecommunications Act of 1996)	Docket No. <u>030339-TP</u>
)	April 11, 2003
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REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE

Allegiance Telecom of Florida, Inc. ("Allegiance"), through undersigned counsel, submits this Request for Representation by a Qualified Representative pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that Allegiance submit a written request to the presiding officer in the event that Allegiance elects to be represented before the Commission by a qualified representative. Allegiance hereby submits such a request.

2. Allegiance seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of Allegiance for any purpose and in all matters or proceedings conducted before the Commission in connection with the above-captioned proceeding:

Michael C. Sloan, Esq.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007-5116
Telephone: 202/424-8458
Facsimile: 202/424-7643

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3. Consistent with Rule 28-106.106(2)(b), Allegiance hereby affirms that it is aware of the services that Mr. Sloan can provide and further, that Allegiance can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1).

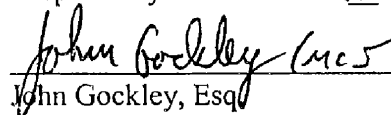
4. Allegiance submits that Mr. Sloan possess the necessary qualifications to responsibly represent Allegiance interest in this matter. In this regard, Mr. Sloan’s qualifications are set forth in the attached affidavit.

5. As reflected in Mr. Sloan’s affidavit, he is: (i) an attorney admitted to practice in the District of Columbia; (ii) has reviewed those portions of the Florida Statutes relative to the Commission’s jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding. In addition, Mr. Sloan has represented other public utility clients, in various other proceedings, before this Commission.

6. Mr. Sloan will conduct himself consistent with the standards set forth in Rule 28-106.107, and Mr. Sloan has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Allegiance is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, Allegiance requests that Mr. Sloan be permitted to appear as qualified representatives on behalf of Allegiance.

Respectfully submitted this 11th day of April, 2003

A handwritten signature in cursive script that reads "John Gockley Esq". The signature is written in black ink and is positioned above a horizontal line.

John Gockley, Esq
Allegiance Telecom of Florida, Inc.
700 E. Butterfield Road, Suite 400
Lombard, IL 60148
Ph: 630-522-5200
Fax: 630-522-5204

Attorney for Allegiance Telecom, Inc.

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_____)

Docket No. _____
April 11, 2003

AFFIDAVIT OF MICHAEL C. SLOAN

I, Michael C. Sloan, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with Swidler Berlin Shereff Friedman, LLP.
2. I am a member in good standing of the District of Columbia Bar and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.
3. I have assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

I declare that the foregoing is true and correct based on my knowledge, information, and belief.




Michael C. Sloan

The District of Columbia)

BEFORE ME, the undersigned Notary Public, on this day personally appeared Michael C. Sloan, who, being my duly sworn on his oath, deposed and said that he has executed the foregoing instrument and that the statements contained therein are true and correct to the best of his knowledge, information and belief.

SUBSCRIBED AND SWORN TO BEFORE ME on this the 11th day of April 2003, to certify which, witness my hand and official seal of office.



Notary Public in and for the District of Columbia

My Commission expires: June 30, 2007