

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint Of AT&T Communications)
Of The Southern States, LLC, Teleport)
Telecommunications Group, Inc., And TCG)
South Florida For Enforcement of)
Interconnection Agreements With BellSouth)
Telecommunications, Inc.)
_____)

Docket No. 020919-TP
Filed: October 15, 2003

REQUEST FOR ORAL ARGUMENT OF AT&T

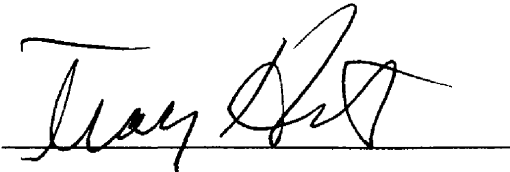
AT&T Communications of the Southern States, LLC, Teleport Communications Group, Inc. and TCG of South Florida ("AT&T"), by and through undersigned counsel, and in accordance with Rules 25-22.058 and 25-22.060, Florida Administrative Code, hereby request oral argument on its Motion for Reconsideration ("Motion") being filed contemporaneously with this Request. AT&T believes that oral argument would assist the Commission in comprehending and evaluating the issues raised in AT&T's Motion.

The substance of the Motion is the meaning and effect of the Commission's decision in Order No. PSC-03-1082-FOF-TP issued in this proceeding on September 30, 2003 ("Final Order"). The Motion identifies specific instances of conflicting provisions within the Commissions Order including the interpretation of the related provisions of the interconnection agreement and applicable Georgia law. Without oral argument, the Commissioners will be less likely to have answers to all of their questions on the issues relating to the legally correct interpretation of the AT&T and

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BellSouth contract based on the "literal words" and unambiguous provisions of the contract. Accordingly, only through oral argument will there be assurances that the record will be complete, thus allowing the Commission to make the necessary findings in the public interest on those issues.

Respectfully submitted,

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