

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission  
Triennial UNE review: Local Circuit Switching  
For Mass Market Customers

Docket No. 030851-TP  
Filed: January 22, 2004

**The Florida Competitive Carriers Association's Motion Requesting  
Leave to File the Supplemental Rebuttal Testimony and Exhibits  
Of Joseph Gillan**

The Florida Competitive Carriers Association (FCCA), pursuant to rule 28-106.204, Florida Administrative Code, files this Motion Requesting Leave to File the attached Supplemental Rebuttal Testimony and Exhibits of Joseph Gillan. As grounds therefore, FCCA states:

1. On December 4, 2003, BellSouth Telecommunications, Inc. (BellSouth) filed the direct testimony and exhibits of Pamela A. Tipton. On December 30, 2003, BellSouth corrected Ms. Tipton's testimony and filed a Corrected Exhibit PAT-5. PAT-5 is Ms. Tipton's position regarding which CLECs meet the self-provisioning trigger.

2. When Mr. Gillan filed his rebuttal testimony on January 7, 2004, he indicated that he needed to fully evaluate the trigger candidates and had only recently been provided the needed information in paper form only. BellSouth indicated that it would not provide the requested data in electronic format to the FCCA, thus necessitating additional work by the FCCA to input the data into an Excel spreadsheet in order to perform a meaningful analysis.

3. There is no prejudice to BellSouth as to this filing because the data Mr. Gillan relies on has been in BellSouth's possession since the inception of the case.

RECEIVED & FILED

*Oh*

FPSC-BUREAU OF RECORDS

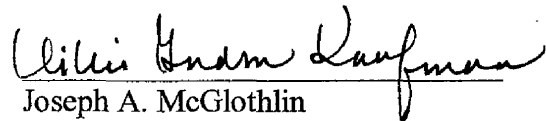
DOCUMENT NUMBER-DATE

01008 JAN 22 2004

FPSC-COMMISSION CLERK

4. The FCCA has attempted to contact the other parties to this docket in regard to this motion. The FCCA represents that MCI, KMC, ITC^DeltaCom, Xspedius, Sprint and FDN have no objection to the motion and that Allegiance takes no position on the motion. The other parties have not yet responded to FCCA's request for their position on the motion.

**WHEREFORE**, FCCA requests that it be permitted to file the attached Supplemental Rebuttal Testimony and Exhibits of Joseph Gillan.



Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525  
(850) 222-5606 (fax)  
vkaufman@mac-law.com

Attorneys for the Florida Competitive  
Carriers Association

## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Florida Competitive Carrier's Association's Motion Requesting Leave to File the Supplemental Rebuttal Testimony and Exhibits of Joseph Gillan has been provided by (\*) hand delivery, (\*\*) email and U.S. Mail this 22<sup>nd</sup> day of January 2004, to the following:

(\*\*) (\*)Jeremy Susac, Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

(\*\*) Nancy White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301-1556

(\*\*) Richard Chapkis  
Verizon Florida, Inc.  
201 North Franklin Street  
MC: FLTC0717  
Tampa, Florida 33602

(\*\*) Susan Masterton  
Sprint Communications Company  
1313 Blairstone Road  
Post Office Box 2214  
MC: FLTLHO0107  
Tallahassee, Florida 32301

(\*\*) Donna Canzano McNulty  
MCI WorldCom  
1203 Governors Square Boulevard  
Suite 201  
Tallahassee, Florida 32301

(\*\*) Norman H. Horton, Jr.  
215 South Monroe Street  
Tallahassee, Florida 32302-1876

(\*\*) Tracy Hatch  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street  
Suite 700  
Tallahassee, Florida 32301

(\*\*) Michael Gross  
Florida Cable Telecommunications  
246 East 6<sup>th</sup> Avenue  
Tallahassee, Florida 32302

(\*\*) Matthew Feil  
Florida Digital Network, Inc.  
390 North Orange Avenue, Suite 2000  
Orlando, Florida 32801

(\*\*) Jeffrey J. Binder  
Allegiance Telecom, Inc.  
1919 M Street, NW  
Washington, DC 20037

(\*\*) Floyd R. Self  
Messer, Capareello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301

(\*\*) Nanette Edwards  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802

(\*\*) Jake E. Jennings  
Senior Vice-President  
Regulatory Affairs & Carrier Relations  
NewSouth Communications Corp.  
NewSouth Center  
Two N. Main Center  
Greenville, SC 29601

(\*\*) Michael B. Twomey  
Post Office Box 5256  
Tallahassee, Florida 32314-5256

(\*\*) Jon C. Moyle, Jr.  
Moyle, Flanigan, Katz, Raymond  
& Sheehan, P.A.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301

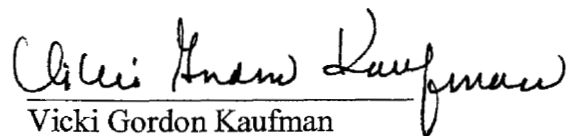
(\*\*) Rand Currier  
Geoff Cookman  
Granite Telecommunications, LLC  
234 Copeland Street  
Quincy, MA

(\*\*) Andrew O. Isar  
Miller Isar, Inc.  
2901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335

(\*\*) Scott A. Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801

(\*\*) Thomas M. Koutsky  
Vice president, Law and Policy  
Z-Tel Communications, Inc.  
1200 19<sup>th</sup> Street, NW Suite 500  
Washington, DC 20036

(\*\*) Charles J. Beck  
Deputy Public Counsel  
Office of Public Counsel  
111 West Madison Street  
c/o The Florida Legislature  
Room 812  
Tallahassee, Florida 32399-1400

  
Vicki Gordon Kaufman