ORIGINAL

FLORIDA PUBLIC SERVICE COMMISSION

| Complaint of IDS Telecom LLC against |) | | |
|---|---|----------------------|------------------|
| BellSouth Telecommunications, Inc. for |) | Docket No. 031125-TP | |
| over billing and discontinuance of service, and |) | | |
| petition for emergency order restoring service |) | Filed: | February 6, 2004 |
| |) | | |

IDS TELECOM LLC's REQUEST FOR ORAL ARGUMENT

PETITIONER IDS TELCOM, LLC ("IDS"), pursuant to Rule 25-22.058, Florida Administrative Code, respectfully requests oral argument on its Response to BellSouth's Partial Motion to Dismiss, filed simultaneously herewith.

As grounds for this request, IDS states that BellSouth's Motion confuses the jurisdictional issues in this proceeding, and suggests that the Commission lacks authority to consider elements of IDS's interconnection complaint. IDS respectfully submits that oral argument would assist the Commission in clarifying this issue.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a copy of the foregoing was furnished by hand delivery this 6th day of February, 2004, to the following:

Beth Keating, Esq. Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Ms. Nancy H. Simms
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