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PLEASE REPLY TO:  
  
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TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

February 25, 2004

VIA HAND DELIVERY

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

Re: Docket No.: 030852-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- Request for Representation by a Qualified Representative, Jennifer Kashatus

Please acknowledge receipt of the above on the extra copy and return the stamped copies to me. Thank you for your assistance.

Sincerely,

*Joe McGlothlin*  
Joseph A. McGlothlin

JAM/lwl  
Enclosures

RECEIVED FPSC  
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CLERK

RECEIVED & FILED  
*Jh*  
FPSC-BUREAU OF RECORDS

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission's  
Triennial UNE review; Location-Specific  
Review for DS1, DS3 and Dark Fiber Loops,  
And Route-Specific Review for DS1, DS3 and  
Dark Fiber Transport.

Docket No. 030852-TP

Filed: February 25, 2004

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**REQUEST FOR REPRESENTATION BY A  
QUALIFIED REPRESENTATIVE, JENNIFER KASHATUS**

Pursuant to Rule 28-106.106, Florida Administrative Code, the Florida Competitive Carriers Association (FCCA), through its undersigned counsel, submits its Request for Representation by a Qualified Representative, Jennifer Kashatus, in the above-referenced proceeding. In support of its Request, the FCCA states:

1. The FCCA is a Florida not-for-profit corporation, whose members provide competitive telecommunications services in the state.

2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request for Representation should be served upon the following individuals:

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

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that the FCCA submit a written request to the presiding officer in

the event that the FCCA elects to be represented before the Commission by a qualified representative. The FCCA hereby submits such a request.

4. The FCCA seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of the FCCA for any purpose and in all matters or proceedings conducted before the Commission in connection with this docket:

Jennifer Kashatus  
Kelley Drye & Warren  
1200 19th Street, N.W.  
Suite 500  
Washington, D.C. 20036  
Telephone 202 955 9600

5. Consistent with Rule 28-106.106(2)(b), the FCCA hereby affirms that it is aware of the services Ms. Kashatus can provide and, further, that the FCCA can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1). Indeed, the FCCA has elected to be represented in this matter by other attorneys in addition to Ms. Kashatus.


6. The FCCA submits that Ms. Kashatus possesses the necessary qualifications to responsibly represent the FCCA’s interests in this matter. In particular, Ms. Kashatus possesses knowledge and experience specific to matters involving the FCC’s Triennial Review Order. Ms. Kashatus’s qualifications are set forth in the attached affidavit, Attachment A.

7. As reflected in Ms. Kashatus’s affidavit, she: (i) is an attorney admitted to practice in the District of Columbia and the State of Maryland; (ii) is familiar with those portions of the Florida Statutes relative to the Commission’s jurisdiction, the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding, and 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.

8. Consistent with the standard set forth in Rule 28-106.107, through her

participation in other proceedings involving the FCC's Triennial Review Order, in addition to her participation on behalf of the FCCA, Ms. Kashatus has acquired actual knowledge of the factual and legal issues involved with her representation of the FCCA in this docket.

**WHEREFORE**, for the above and foregoing reasons, the FCCA requests that Ms. Kashatus be permitted to appear as a qualified representative on behalf of the FCCA.

  
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Kaufman & Arnold, P.A.  
117 South Gadsden Street  
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(850) 222-2525  
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[jmcclothlin@mac-law.com](mailto:jmcclothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Attorneys for Florida Competitive Carriers  
Association

Attachment A

**Affidavit of Jennifer Kashatus**

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In re: Implementation of requirements arising  
From Federal Communications Commission's  
Triennial UNE review; Location-Specific  
Review for DS1, DS3 and Dark Fiber Loops,  
And Route-Specific Review for DS1, DS3 and  
Dark Fiber Transport.

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Docket No. 030852-TP

**AFFIDAVIT OF JENNIFER KASHATUS**

STATE OF FLORIDA

COUNTY OF LEON

I, Jennifer Kashatus, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with the law firm of Kelley Drye & Warren LLP.
2. I am a member in good standing of the District of Columbia and Maryland Bars 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 served as regulatory counsel to several clients in proceedings before state commissions. Moreover, I have participated in Triennial Review 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

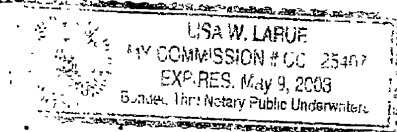
I declare that the foregoing is true and correct based on my knowledge, information and belief.

  
Jennifer Kashatus

SWORN TO AND SUBSCRIBED before me this 25<sup>th</sup> day of February, 2004.

*Lisa W. LaFue*

Notary Public



My Commission expires:

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Florida Competitive Carriers Association's Request for Representation by a Qualified Representative, Jennifer Kashatus, has been provided by (\*) hand delivery, (\*\*) email and U.S. Mail this 25th day of February, 2004, to the following:

(\*\*) Adam Teitzman, 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 Mornoe 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.  
2300 Lucien Way, Suite 200  
Maitland, Florida 32751

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

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

(\*\*) Nanette Edwards  
ITC^DeltaCom  
4092 S. Memorial Parkway  
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(\*\*) Jake E. Jennings  
Senior Vice-President  
Regulatory Affairs & Carrier Relations  
NewSouth Communications Corp.  
NewSouth Center  
Two N. Main Center  
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(\*\*) Jon C. Moyle, Jr.  
Moyle, Flanigan, Katz, Raymond  
& Sheehan, P.A.  
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118 North Gadsden Street  
Tallahassee, FL 32301

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Vice-President  
Regulatory and legal Affairs  
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301 North Main Street  
Greenville, SC 29601

(\*\*) Rand Currier  
Geoff Cookman  
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Quincy, MA

(\*\*) Andrew O. Isar  
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2901 Skansie Avenue, Suite 240  
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(\*\*) Scott A. Kassman  
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390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801

(\*\*) Rabinai Carson  
Xspedius Communications  
5555 Winghaven Blvd., Suite 3000  
O'Fallon, MO 63366-3868

  
Joseph A. McGlothlin