# Messer, Caparello & Self

A Professional Association

Post Office Box 1876 Tallahassee, Florida 32302-1876 Internet: www.lawfla.com

March 29, 2004

#### **BY HAND DELIVERY**

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 040064-OT

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom and d/b/a Grapevine are an original and fifteen copies of ITC^DeltaCom's Request for Naming of Qualified Representative in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours, Floyd R. Self

FRS/amb Enclosures cc: Parties of Record

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しはしてい DOWNTOWN OFFICE, 215 South Monroe Street, Suite 701 · Tallahassee, Fl 32301 · Phone (850) 222-0720 · Fax (850) 224-4359 NORTHEAST OFFICE, 3116 Capital Circle, NE, Suite 5 · Tallahassee, Fl 32308 · Phone (850) 668-5246 FFSC (850) 668-5613 NORTHEAST OFFICE, 3116 Capital Circle, NE, Suite 5 · Tallahassee, Fl 32308 · Phone (850) 668-5246 FFSC (850) 668-5613

#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Request for Naming of Qualified Representative Docket No. 040064-OT Filed: March 29, 2004

## **REQUEST FOR NAMING OF QUALIFIED REPRESENTATIVE**

Pursuant to Rule 28-106.107, Florida Administrative Code, ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom and d/b/a Grapevine ("ITC^DeltaCom") request that Nanette Edwards, Director - Regulatory, Sr. Attorney, be named a qualified representative of ITC^DeltaCom in all docketed and nondocketed matters opened during the next twelve months. ITC^DeltaCom is aware that it can be represented as defined in Rule 28-106.106, Florida Administrative Code, and has chosen otherwise.

Attached hereto is a sworn affidavit setting forth Ms. Edwards qualifications. Ms. Edwards is located at 4092 S. Memorial Parkway, Huntsville, Alabama 35802, telephone number 256-382-

• WHEREFORE, ITC^DeltaCom requests that the Florida Public Service Commission grant this request.

Respectfully submitted this 29th day of March, 2004.

Floyd R. Self/Esq. Messer, Caparello & Self, P.A. 215 S. Monroe Street, Suite 701 Tallahassee, FL 32301 Telephone 850-222-0720 Florida Bar No.

Attorneys for ITC^DeltaCom Communic ations, Inc.

### AFFIDAVIT

Undersigned counsel, being first duly sworn, states that:

Undersigned counsel is currently employed by <u>ITC^DeltaCom Communications, Inc.</u> <u>d/b/a ITC^DeltaCom and d/b/a Grapevine</u>, as <u>Director – Regulatory, Sr. Attorney</u>, at the address and telephone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent ITC^DeltaCom's interest in Florida Public Service Commission proceedings during calendar year 2004.

Undersigned counsel is an attorney admitted to practice, and a member in good standing of the State of <u>Alabama and South Carolina</u>, Bar No. <u>ASB-1223-R49N and 9982 respectively</u> ; has practiced extensively before this and other utility regulatory agencies or authorities; has knowledge of the Florida Statutes relative to the Commission's jurisdiction; has knowledge of the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; has knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; has acquired or will acquire knowledge of the factual and legal issues in each and any matter in which undersigned counsel may be called upon to provide representation before the Florida Public Service Commission; and has knowledge of and compliance with the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.

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1. SS.J. m

Nanette S. Edwards Director – Regulatory, Sr. Attorney 4092 S. Memorial Parkway Huntsville, AL 35802 (256) 382-3856 (256) 382-3936

State of County of

Affirmed and subscribed before me this <u>10<sup>th</sup></u> day of <u>February</u>, 2004.

ane Notary Public

Date of Expiration: 1 - 12 - 08