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May 28, 2004

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

HAND DELIVERED

RECEIVED FPSC
MAY 28 AM 11:55
COMMISSION CLERK

Re: Docket No. 030643-TP

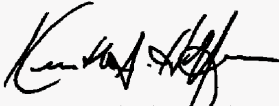
Dear Ms. Bayo:

Enclosed for filing on behalf of Teleport Communications Group and TCG South Florida ("TCG") are an original and fifteen copies of TCG's Opposition to Verizon's Motion for Leave to File Clarification.

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

Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

- CMP _____
- COM _____
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DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida, Inc. (f/ka/GTE)
Florida Inc.) against Teleport Communications)
Group, Inc. and TCG South Florida, for review) Docket No. 030643-TP
of a decision by The American Arbitration)
Association in Accordance with Attachment 1) Filed: May 28, 2004
Section 11.2 (a) of the Interconnection Agreement)
between GTE Florida Inc. and TCG South Florida)

**TCG'S OPPOSITION TO VERIZON'S MOTION
FOR LEAVE TO FILE CLARIFICATION**

Teleport Communications Group and TCG South Florida ("TCG") hereby responds in opposition to Verizon Florida Inc.'s ("Verizon") Motion for Leave to File Clarification, and states as follows:

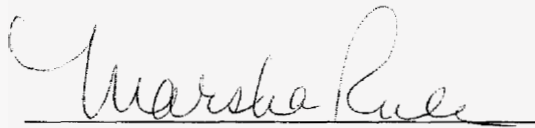
1. Verizon did not contact TCG prior to filing its Motion as required by Rule 28.106.204(3), Florida Administrative Code, and has not served a copy of its Motion on TCG. The copy provided to TCG by Commission Staff does not indicate service on TCG as required by Rule 1.080, Florida Rules of Civil Procedure.

2. TCG objects to Verizon's Motion and asks the Prehearing Officer to deny Verizon leave to file its proposed Clarification. Verizon had ample opportunity to address the issues raised by the Commission during its May 3, 2004, Agenda Conference, and it is inappropriate to extend a second opportunity to Verizon to expand upon its previous filing. Verizon has not alleged any good cause for its request to "clarify" its filing, and TCG notes that neither the Commission's rules nor the Uniform Rules of Procedure permit this unorthodox procedure.

DOCUMENT NUMBER-DATE
06102 MAY 28 2004
FPSC-COMMISSION CLERK

3. TCG received notice of Verizon's Motion via telephone call from Commission Staff late in the afternoon of Thursday, May 27, 2004 -- only one business day before TCG's response is due, and directly prior to a holiday weekend. Verizon's actions have once again created confusion, uncertainty and delay in the final resolution of this private arbitration action. TCG should not be forced to file piecemeal responses to Verizon's filings. Accordingly, since TCG does not know whether a decision will be made on Verizon's Motion for Leave to File Clarification prior to the current date for TCG's response (June 1, 2004), TCG requests that it be granted an extension of ten (10) days up to and until June 14, 2004, to file its response to Verizon's Supplemental Brief (and to the unauthorized "Clarification" if that pleading is permitted).

Respectfully submitted,



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Attorneys for Teleport Communications Group,
Inc., and TCG South Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a copy of the foregoing Notice and attachment was furnished by U.S. Mail or hand delivery (*) this 28th day of May, 2004, to the following:

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