

ORIGINAL
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July 6, 2004

VIA HAND DELIVERY

Ms. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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JUL -6 PM 4:37
COMMISSION
CLERK

Re: Docket numbers-040527-TP

Dear Ms. Bayó,

On behalf of NuVox Communications, Inc., enclosed please find the original and fifteen (15) copies of two Motions for Qualified Representative to Appear on Behalf of NuVox Communications, Inc., one for John J. Heitmann and one for Jennifer M. Kashatus.


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

Sincerely,


Diana Shumans

- CMP _____
- COM _____
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Heitmann-07359-1
Kashatus-07360-0

DOCUMENT NUMBER-DATE

07359 JUL -6 3

FPSC-COMMISSION CLERK

**Before the
FLORIDA PUBLIC SERVICE COMMISSION**

In re:)
)
Enforcement of Interconnection Agreement)
Between BellSouth Telecommunications, Inc. and) Docket No.: 040527-TP
NuVox Communications, Inc.)

**MOTION FOR QUALIFIED REPRESENTATIVE JOHN J. HEITMANN TO
APPEAR ON BEHALF OF NUVOX COMMUNICATIONS, INC.**

Pursuant to Rules 28-106.106, 28-106.107 and 28-106.204 of the Florida Administrative Code ("F.A.C.") NuVox Communications Inc. ("NuVox"), respectfully moves the Commission to enter an Order designating John J. Heitmann, Esquire, as a Qualified Representative authorized to appear in the above-styled matter on behalf of NuVox. The grounds for this motion are as follows:

1. Mr. Heitmann is admitted to practice law in the State of New York and in the District of Columbia and is in good standing with all the Bars in which he is admitted to practice.
2. Mr. Heitmann has practiced law for ten years. He is knowledgeable concerning telecommunications law, the nature of these proceedings, and the applicable law. Mr. Heitmann is also familiar with the rules of evidence. Ms. Heitmann will comply with the standards of conduct set forth in F.A.C. Rule 28-106.107.
3. Mr. Heitmann is a partner with the law firm of Kelley Drye & Warren LLP, and his professional address and telephone number are 1200 19th Street, NW, Suite 500, Washington, D.C. 20036, (202) 955-9888.
4. NuVox is aware of the services that Mr. Heitmann can and will be performing.

5. The law firm of Moyle, Flanigan, Katz, Raymond & Sheehan, P.A., in conjunction with having Mr. Heitmann authorized to appear in the proceeding as a Qualified Representative, will ensure that NuVox is well represented in the above-styled matter.

WHEREFORE, NuVox respectfully requests the entry of an Order authorizing Mr. Heitmann to appear in this proceeding as a Qualified Representative for NuVox Communications Inc.

Respectfully submitted,

NuVox Communications Inc.



Jon C. Moyle, Jr.

Florida Bar No. 0727016

Diana K. Shumans

Florida Bar No. 0675822

Moyle, Flanigan, Katz, Raymond and
Sheehan, P.A.

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Attorney for NuVox Communications Inc.

Dated: July 6, 2004

CERTIFICATE OF SERVICE

I, DIANA K. SHUMANS, hereby certify that a true and correct copy of the foregoing document was sent by U.S. Mail on this 6th day of July, 2004 to the following:

Lee Fordham, Esquire
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Diana K. Shumans