

LAW OFFICES
Messer, Caparello & Self
A Professional Association

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

March 23, 2005

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. 041144-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of KMC Telecom III LLC, KMC Telecom V, Inc., and KMC Data LLC ("KMC") are an original and fifteen copies of KMC's Request to Address the Commission on Sprint-Florida Inc.'s Motion to Strike the Answer, Affirmative Defenses and Counterclaim, and Motion to Dismiss the Counterclaim or, in the Alternative, Motion to Bifurcate the Counterclaim 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

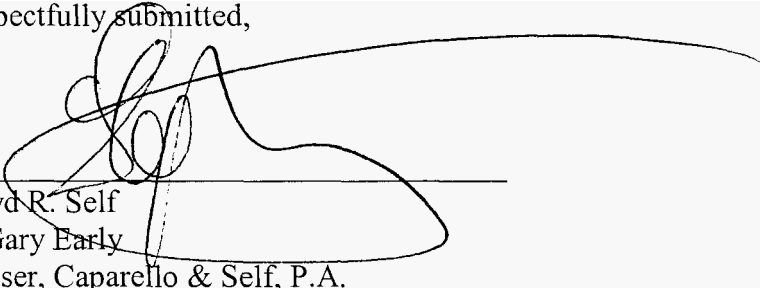
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Sprint-Florida, Incorporated)
Against KMC Telecom III LLC,)
KMC Telecom V, Inc. and KMC Data LLC,) Docket No. 041144-TP
for failure to pay intrastate access charges) Filed: March 25, 2005
pursuant to its interconnection agreement and)
Sprint's tariffs and for violation of)
Section 364.16(3)(a), Florida Statutes.)
_____)

**KMC TELECOM III LLC, KMC TELECOM V, INC. AND KMC DATA LLC'S
REQUEST TO ADDRESS THE COMMISSION ON SPRINT-FLORIDA INC.'S
MOTION TO STRIKE THE ANSWER, AFFIRMATIVE DEFENSES AND
COUNTERCLAIM, AND MOTION TO DISMISS THE COUNTERCLAIM OR, IN THE
ALTERNATIVE, MOTION TO BIFURCATE THE COUNTERCLAIM**

KMC Telecom III LLC, KMC Telecom V, Inc., and KMC Data LLC (collectively "KMC"), pursuant to Rules 25-22.0021(1), Florida Administrative Code, hereby requests that it be granted an opportunity to address the Commission on Sprint-Florida Inc.'s Motion to Strike the Answer, Affirmative Defenses and Counterclaim, and Motion to Dismiss the Counterclaim or, in the Alternative, Motion to Bifurcate the Counterclaim, and KMC's Response thereto when they are taken up by the Commission at the agenda conference.

Respectfully submitted,



Floyd R. Self
E. Gary Early
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
Telephone: (850) 222-0720
Facsimile: (850) 224-4359
e-mail: fself@lawfla.com
e-mail: gearly@lawfla.com

and

Edward A. Yorkgitis, Jr.
Barbara Miller
Kelley Drye & Warren LLP
1200 19th Street, N.W., Fifth Floor
Washington, D.C. 20036
Telephone: (202) 955-9600
Facsimile: (202) 955-9792
e-mail: cyorkgitis@kelleydrye.com
e-mail: bmiller@kelleydrye.com

Attorneys for KMC Telecom III LLC,
KMC Telecom V, Inc., and KMC Data LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served upon the following parties by hand delivery (*), electronic mail and/or U.S. Mail this 25th day of March, 2005.

Lee Fordham, Esq.*
General Counsel's Office, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Dovie L. Rockette-Gray*
General Counsel's Office, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Ms. Nancy Pruitt*
Division of Competitive Markets and Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Susan Masterton, Esq.*
Sprint-Florida, Incorporated
1313 Blair Stone Road
Tallahassee, FL 32301

Sprint Communications Company,
Limited Partnership d/b/a Sprint
c/o Sprint-Florida, Incorporated
P.O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214



Floyd R. Self