

ORIGINAL

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**Sent:** Tuesday, June 21, 2005 2:34 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** BILL HOLLIMON; Jason Rojas; Jennifer Kashatus; Jeremy Susac; John Heitmann; Kip Edenfield; Theodore Marcus; Vicki Gordon Kaufman  
**Subject:** Docket No. 040028-TP  
**Attachments:** Motion for Qualified Rep - Heitmann 06.21.05.pdf

<<Motion for Qualified Rep - Heitmann 06.21.05.pdf>>

Pursuant to the Commission's procedures for e-filing, NewSouth Communications Corp. provides the following information:

A. The attorney responsible for filing is:

Vicki Gordon Kaufman  
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B. The document is to be filed in Docket No. 040028-TP.

C. The document is filed on behalf of NewSouth Communications Corp..

D. The document is 3 pages long.

E. The document is Motion for Qualified Representative John J. Heitmann to Appear on Behalf of NewSouth Communications Corp..

**CJ Cratty**

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DOCUMENT NUMBER-DATE

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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

Complaint and Request for Summary Disposition	)	Docket No. 040028-TP
BellSouth Telecommunications, Inc. Against	)	
NewSouth Communications Corp., To Enforce	)	
Contract Audit Provisions	)	Filed: June 21, 2005

**MOTION FOR QUALIFIED REPRESENTATIVE JOHN J. HEITMANN TO APPEAR  
ON BEHALF OF NEWSOUTH COMMUNICATIONS CORP.**

Pursuant to Rules 28-106.106, 28-106.107 and 28-106.204 of the Florida Administrative Code (“F.A.C.”), NewSouth Communications Corp. (“NewSouth”) respectfully moves the Commission to enter an Order designated John J. Heitmann, Esquire as a Qualified Representative authorized to appear in the above-styled matter on behalf of NewSouth. 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 to 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. Mr. 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 19<sup>th</sup> Street, NW, Suite 500, Washington, D.C. 20036; (202) 955-9888.
4. NewSouth 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 NewSouth is well represented in the above-styled matter.

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

Respectfully submitted,  
**NewSouth Communications Corp.**

S/ Vicki Gordon Kaufman

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Jon Moyle, Jr.  
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*Counsel to NewSouth Communications Corp.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Qualified Representative John J. Heitmann to Appear on Behalf of NewSouth Communications Corp. was served via electronic mail and U.S. mail this 21<sup>st</sup> day of June 2005 on the following parties of record:

Jason Rojas  
Jeremy Susac  
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Florida Public Service Commission  
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Kip Edenfield  
Theodore Marcus  
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c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

S/ Vicki Gordon Kaufman  
Vicki Gordon Kaufman