

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the )  
Establishment of Operations Support )  
Systems Permanent Performance )  
Measures for Incumbent Local )  
Exchange Telecommunications )  
Companies (BellSouth Track). )  
\_\_\_\_\_ )

Filed: June 21, 2005

Docket No.: 000121A-TP

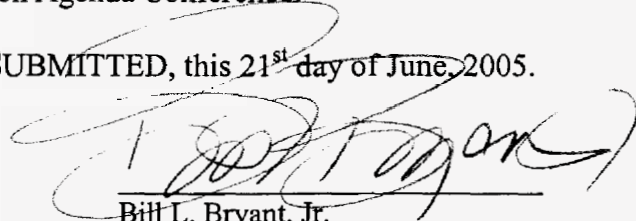
FDN COMMUNICATIONS' REQUEST FOR ORAL ARGUMENT

Pursuant to Rules 25-22.058 and 25-22.060, Florida Administrative Code, Florida Digital Network, Inc., d/b/a FDN Communications ("FDN") respectfully requests oral argument on the Response of Florida Digital Network, Inc., d/b/a FDN Communications in Opposition to BellSouth Telecommunication, Inc.'s Motion to Dismiss ("Response") filed contemporaneous to this Request. In support of this Request, FDN states as follows:

1. The Response presents issues extraordinarily material to competition in the telecommunications market in the State of Florida. Oral argument will insure that the Commission understands the gravity of the matter, and
2. The revised plan approved by the PAA Order constitutes the first major revision to the SQM/SEEM plan.

WHEREFORE, FDN respectfully requests oral argument on its Response at the earliest available Commission Agenda Conference.

RESPECTFULLY SUBMITTED, this 21<sup>st</sup> day of June, 2005.



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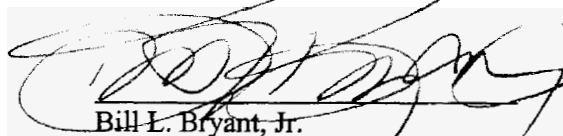
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to the following by Email, if available, and by U.S. mail this 21st day of June, 2005.

|                                                                                                                                                   |                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| AT&T<br>Tracy Hatch<br>101 North Monroe Street, Suite 700<br>Tallahassee, FL 32301                                                                | Blanca S. Bayo<br>Florida Public Service Commission<br>2540 Shumard Oak Boulevard<br>Tallahassee, FL 32399-0850                                  |
| BellSouth Telecommunications, Inc.<br>Ms. Nancy B. White<br>c/o Nancy H. Sims<br>150 South Monroe Street, Suite 400<br>Tallahassee, FL 32301-1556 | Covad Communications Company<br>Mr. William Weber<br>19 <sup>th</sup> Floor, Promenade II<br>1230 Peachtree Street, NE<br>Atlanta, GA 30309-3574 |
| Florida Cable Telecommunications Assoc<br>Michael A. Gross<br>246 E. 6th Avenue, Suite 100<br>Tallahassee, FL 32302                               | IDS Telcom, LLC<br>Angel Leiro<br>1525 N.W. 167th Street, Second Floor<br>Miami, FL 33169-5131                                                   |
| ITC^Deltacom<br>Nanette S. Edwards<br>4092 South Memorial Parkway<br>Huntsville, AL 35802-4343                                                    | Kelley Drye & Warren, LLP<br>Jonathan Canis/Michael Hazzard<br>1200 19th Street NW, Fifth Floor<br>Washington, DC 20036                          |
| KMC Telecom Inc.<br>Mr. John D. McLaughlin, Jr.<br>1755 North Brown Road<br>Lawrenceville, GA 30043                                               | MCI<br>Donna Canzano-McNulty<br>1203 Governors Square Blvd., Suite 201<br>Tallahassee, FL 32301-2960                                             |
| WorldCom, Inc.<br>Dulaney O'Roark, III<br>Six Concourse Parkway, Suite 3200<br>Atlanta, GA 30328                                                  | Messer Law Firm<br>Floyd Self<br>Norman Horton<br>P.O. Box 1867<br>Tallahassee, FL 32302-1876                                                    |
| Moyle Flanigan Katz Raymond & Sheehan, P.A.<br>Vicki Kaufman<br>118 North Gadsden Street<br>Tallahassee, FL 32301                                 | Mpower Communications Corp.<br>David Wodds�mall<br>175 Sully's Trail, Suite 300<br>Pittsford, NY 14534-4558                                      |
| Pennington Law Firm<br>Peter Dunbar<br>Karen Camechis<br>P.O. Box 10095<br>Tallahassee, FL 32302-2095                                             | Sprint Communications Company<br>Susan Masterton/Charles Rehwinkel<br>P.O. Box 2214<br>MC: FLTLHO0107<br>Tallahassee, FL 32316-2214              |
| Supra Telecom<br>Mr. Brian Chaiken<br>2901 SW 149 <sup>th</sup> Avenue, Suite 300<br>Miramar, FL 33027-4153                                       | e.spire Communications, Inc.<br>Renee Terry<br>131 National Business Parkway, #100<br>Annapolis Junction, MD 20701-10001                         |

|                                                                                                                     |                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Rutledge Law Firm<br>Kenneth Hoffman<br>John Ellis<br>P.O. Box 551<br>Tallahassee, FL 32302-0551                    | Verizon Select Services Inc.<br>Kimberly Caswell<br>P.O. Box 110, FLTC0007<br>Tampa, FL 33601-0110                                    |
| Z-Tel Communications, Inc.<br>John Rubino/George S. Ford<br>601 S. Harbour Island Blvd.<br>Tampa, FL 33602-5706     | Florida Public Service Commission<br>Mr. Adam Teitzman<br>2540 Shumard Oak Blvd<br>Tallahassee, FL 32399-0850                         |
| ALLTEL Communications, Inc.<br>c/o Ausley Law Firm<br>Jeffrey Whalen<br>P.O. Box 391<br>Tallahassee, FL 32302       | BellSouth Telecom, Inc.<br>Patrick W. Turner/R. Douglas Lackey<br>675 W. Peachtree Street, Suite 4300<br>Atlanta, GA 30375            |
| Miller Isar, Inc.<br>Andrew O. Isar<br>7901 Skansie Avenue, Suite 240<br>Gig Harbor, WA 98225                       | Birch Telecom of the South, Inc.<br>Tad J. Sauder<br>Manager, ILEC Performance Data<br>2020 Baltimore Avenue<br>Kansas City, MO 64108 |
| Suzanne F. Summerlin<br>2536 Capital Medical Boulevard<br>Tallahassee, FL 32308-4424                                | Rick Richardson<br>Momentum Business Solutions, Inc.<br>2700 Corporate Drive<br>Suite 200<br>Birmingham, AL 35242                     |
| Russell E. Hamilton, III<br>Nuvox Communications, Inc.<br>301 North Main Street, Suite 5000<br>Greenville, SC 29601 |                                                                                                                                       |

RESPECTFULLY SUBMITTED, this 21<sup>st</sup> day of June, 2005.



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