

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: January 3, 2006
pursuant to its interconnection agreement and)
Sprint's tariffs and for violation of)
Section 364.16(3)(a), Florida Statutes.)
_____)

**KMC TELECOM III LLC AND KMC TELECOM V, INC.'S
REQUEST FOR ORAL ARGUMENT**

KMC Telecom III LLC, KMC Telecom V, Inc., and KMC Data LLC (collectively "KMC"), pursuant to Rules 25-22.058 and 25-22.060(1)(f), Florida Administrative Code, hereby request that they be granted an opportunity to present oral argument KMC's Motion to Reconsider the Commission's Order No. PSC-05-1234-FOF-TP. Oral argument will aid the Commission in comprehending and evaluating the issues before it, particularly given that outgoing Commissioners Baez and Bradley will have been replaced by new members of the Commission. Although the new Commissioners will have access to the record, the opportunity for the parties to explain the substance and effect of the Motion for Reconsideration will allow the Commissioners to gain a more thorough understanding and clarification of the issues raised therein. This is particularly true with respect to understanding the arguments pertaining to the impermissible shift in the burden of proof to KMC, the legal background and basis to the FCC's rulings on enhanced services, and the problems KMC has encountered thus far with respect to an impartial, independent auditor. These matters are identified in the Motion for Reconsideration.

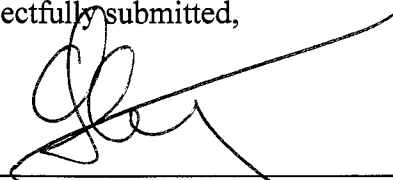
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WHEREFORE, KMC respectfully requests that it be granted oral argument on its Motion for Reconsideration.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served upon the following parties by electronic mail and/or U.S. Mail this 3rd day of January, 2006.

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