## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of Embarq Florida, Inc. f/k/a Sprint-Florida, Incorporated against AT&T Communications of the Southern States, LLC d/b/a AT&T d/b/a Lucky Dog Phone Co. d/b/a ACC Business d/b/a SmarTalk d/b/a Unispeaksm Service d/b/a <u>www.prepaidserviceguide.com</u> d/b/a/ CONQUEST for failure to pay intrastate access charges pursuant to Embarq's tariffs Filed: July 10, 2006

## AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S REQUEST FOR ORAL ARGUMENT

AT&T Communications of the Southern States, LLC ("AT&T), pursuant to Rule 25-22.058, Florida Administrative Code, requests oral argument on its contemporaneously filed Motion to Dismiss Embarq's Complaint or, in the Alternative, Stay the Proceeding. AT&T respectfully submits that oral argument would help the Commission achieve a full and complete understanding of the intertwined federal and state issues discussed in its motion. AT&T thus requests the opportunity to be heard.

Respectfully submitted this 10<sup>th</sup> day of July, 2006.

## HOLLAND & KNIGHT LLP

D Bruce May, Jr. Florida Bar No. 354473 Holland & Knight, LLP 315 South Calhoun Street, Suite 600 Tallahassee, Florida 32301 Post Office Drawer 810 Tallahassee, Florida 32302-0810 Phone: (850) 224-7000 Fax: (850) 224-8832

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Attorneys for AT&T Communications of the Southern States, LLC

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was provided by hand-delivery and U.S. Mail to Susan S. Masterton, Counsel for Embarq Corporation, 1313 Blair Stone Road, Tallahassee, Florida 32301; Patrick Wiggins/Adam Teitzman, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 and Beth Salak, Director, Division of Competitive Markets and Enforcement, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 all on this 10<sup>th</sup> day of July, 2006.

ce May, Jr.

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