

**Marguerite McLean**

100021-TP  
100022-TP

**From:** WOODS, VICKIE (Legal) [vf1979@att.com]  
**Sent:** Friday, April 09, 2010 2:43 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** 100021/100022-TP AT&T Florida's Response to LifeConnex and NewPhone's Requests for Oral Argument  
**Importance:** High  
**Attachments:** Document.pdf

- A. Vickie Woods  
BellSouth Telecommunications, Inc. d/b/a AT&T Florida  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(305) 347-5560  
vf1979@att.com
- B. Docket No.: 100021-TP: Complaint of BellSouth Telecommunications,  
  
Inc. d/b/a AT&T Florida Against LifeConnex Telecom, LLC f/k/a Swiftel, LLC  
  
Docket No. 100022-TP: Complaint of BellSouth Telecommunications,  
  
Inc. d/b/a AT&T Florida Against Image Access, Inc. d/b/a New Phone
- C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida  
  
on behalf of Manuel A. Gurdian
- D. 3 pages total (includes letter, pleading and certificate of service)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to LifeConnex and NewPhone's Requests for Oral Argument  
  
.pdf

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4/9/2010

DOCUMENT NUMBER-DATE  
02689 APR-9 2010  
FPSC-COMMISSION CLERK



Manuel A. Gurdian  
General Attorney

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April 9, 2010

Ms. Ann Cole  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Docket No.: 100021-TP: Complaint of BellSouth Telecommunications, Inc. d/b/a AT&T Florida Against LifeConnex Telecom, LLC f/k/a Swiftel, LLC**

**Docket No. 100022-TP: Complaint of BellSouth Telecommunications, Inc. d/b/a AT&T Florida Against Image Access, Inc. d/b/a New Phone**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to LifeConnex and NewPhone's Requests for Oral Argument, which we ask that you file in the captioned dockets.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian

cc: All parties of record  
Gregory R. Follensbee  
Jerry D. Hendrix  
E. Earl Edenfield, Jr.

DOCUMENT NUMBER-DATE  
02689 APR-9e  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of BellSouth ) Docket No. 100021-TP  
Telecommunications, Inc. d/b/a AT&T )  
Florida Against LifeConnex Telecom, LLC )  
f/k/a Swiftel, LLC )

In re: Complaint of BellSouth ) Docket No. 100022-TP  
Telecommunications, Inc. d/b/a AT&T )  
Florida Against Image Access, Inc. d/b/a )  
New Phone ) Filed: April 9, 2010

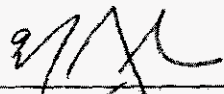
**AT&T FLORIDA'S RESPONSE TO LIFECONNEX AND NEWPHONE'S  
REQUESTS FOR ORAL ARGUMENT**

BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T Florida ("AT&T Florida"), respectfully submits this Response to Requests for Oral Argument<sup>1</sup> filed by Image Access, Inc. d/b/a NewPhone ("NewPhone") and LifeConnex Telecom, LLC f/k/a Swiftel, LLC ("LifeConnex").

AT&T Florida believes that the parties' pleadings adequately explain the parties' respective positions and that oral argument is not required. To the extent that the Commission grants oral argument, AT&T Florida requests an opportunity to respond to any argument presented by LifeConnex and NewPhone regarding their Motion to Dismiss and/or Stay.

Respectfully submitted on this the 9th day of April, 2010.

AT&T FLORIDA

  
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E. Earl Edenfield, Jr.  
Tracy W. Hatch  
Manuel A. Gurdian  
c/o Gregory R. Follensbee  
150 South Monroe Street  
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Tallahassee, Florida 32301  
(305) 347-5558

<sup>1</sup> LifeConnex and NewPhone's Requests incorrectly refer to Rule 25-22.058 (repealed) for authority to request oral argument. The correct citation is Rule 25-22.0022, F.A.C.

DOCUMENT NUMBER-DATE

02689 APR-9 2

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**CERTIFICATE OF SERVICE**  
**Docket Nos. 100021-TP and 100022-TP**

I HEREBY CERTIFY that a true and correct copy was served via

Electronic Mail and First Class U. S. Mail this 9th of April, 2010 to the following:

Charles Murphy  
Staff Counsel  
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LifeConnex Telecom, LLC  
Mr. Edward Heard  
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Manuel A. Gurdian