

GRAHAM & MOODY

ATTORNEYS AT LAW

WILLIAM B. GRAHAM
W. DOUGLAS MOODY, JR.
RICHARD N. SOX, JR.

CERTAIN ATTORNEYS ALSO
ADMITTED IN GEORGIA,
AND TEXAS

ROBERT F. REYES*
GOVERNMENTAL CONSULTANT
*NOT A MEMBER OF THE FLORIDA BAR

June 22, 1999

VIA HAND DELIVERY

Ms. Blanco Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 990149-TP

Dear Ms. Bayo:

MediaOne Florida Telecommunications, Inc. requests that Dick Karre, Esq. and Susan Keesen, Esq. be named as qualified representatives in the above-referenced docket.

Both of these individuals are located at MediaOne Group, 5613 DTC Parkway, Ste. 800, Englewood, CO 80111. In addition to this request, MediaOne will be represented in these proceedings by the undersigned counsel.

Respectfully submitted,



William B. Graham

- AFA _____
- APP _____
- CAF _____
- CMU King
- CTR _____
- EAG _____
- LEG LWBG/ktc
- MAS _____
- OPC cc: Nancy White
- RRR _____
- SEC Lee Fordham
- WAW _____
- OTH _____

DOCUMENT NUMBER-DATE

07508 JUN 23 1999

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Respectfully submitted,


William B. Graham

WBG/ktc
cc: Nancy White
Lee Fordham
J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne
Florida Telecommunications,
Inc. for arbitration of an
interconnection agreement with
BellSouth Telecommunications,
Inc. pursuant to Section 252(b) DOCKET NO. 990149-TP
of the Telecommunications Act
of 1996. DATED: June 22, 1999

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing filing has
been furnished by U.S. Mail to:

J. Phillip Carver
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, FL 32399

Lee Fordham, Esq.
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

this 22nd day of June, 1999.



William B. Graham, Esq.
Fla. Bar No. 359068
Graham & Moody, P.A.
101 N. Gadsden Street
Tallahassee, FL 32301
(850) 222-6656

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne
Florida Telecommunications,
Inc. for arbitration of an
interconnection agreement with
BellSouth Telecommunications,
Inc. pursuant to Section 252(b) DOCKET NO. 990149-TP
of the Telecommunications Act
of 1996. DATED: June 21, 1999

AFFIDAVIT

COUNTY OF ARAPAHOE

STATE OF COLORADO

BEFORE ME, the undersigned authority, this day personally appeared SUSAN KEESEN, ESQ. who, being by me first duly sworn, deposes and says:

1. That I am over the age of 21 and am authorized to make this affidavit .

2. That I am employed by MediaOne Group, Inc. as Associate General Counsel at 188 Inverness Drive West, Englewood, Colorado 80112.

3. That I possess the necessary qualifications to represent MediaOne Florida Telecommunications, Inc. in Docket No. 990149-TP before the Florida Public Service Commission.

4. That I have personal knowledge of the factual and legal issues involved in this proceeding.

5. That I am an attorney admitted to practice in the State of Colorado and I am a member in good standing of the Colorado Bar. Bar No. 007721.

6. That I have practiced extensively in the area of

telecommunications law before numerous regulatory agencies.

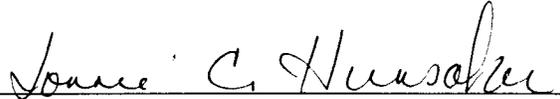
7. That I have knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings as well as the Florida Administrative Code and Florida Statutes regarding evidence and the treatment of hearsay in an administrative setting. Further that I have knowledge of and will comply with the standards of conduct for persons appearing as qualified representatives before the Florida Department of Administrative Hearings as contained in the Florida Administrative Code.

FURTHER AFFIANT SAYETH NAUGHT.



AFFIANT

SWORN TO AND SUBSCRIBED before me this 21st day of June, 1999, by the Affiant, **SUSAN KEESEN, ESQ**, who: is personally known to me.



NOTARY

(SEAL)

My Commission Expires: 6/17/2001.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne
Florida Telecommunications,
Inc. for arbitration of an
interconnection agreement with
BellSouth Telecommunications,
Inc. pursuant to Section 252(b) DOCKET NO. 990149-TP
of the Telecommunications Act
of 1996. DATED: June 21, 1999

AFFIDAVIT

COUNTY OF ARAPAHOE

STATE OF COLORADO

BEFORE ME, the undersigned authority, this day personally appeared RICHARD KARRE, ESQ. who, being by me first duly sworn, deposes and says:

1. That I am over the age of 21 and am authorized to make this affidavit .

2. That I am employed by MediaOne Group, Inc. as Senior Attorney at 188 Inverness Drive West, Englewood, Colorado 80112.

3. That I possess the necessary qualifications to represent MediaOne Florida Telecommunications, Inc. in Docket No. 990149-TP before the Florida Public Service Commission.

4. That I have personal knowledge of the factual and legal issues involved in this proceeding.

5. That I am an attorney admitted to practice in the State of Colorado and I am a member in good standing of the Colorado Bar. Bar No.18483.

6. That I have practiced extensively in the area of telecommunications law before numerous regulatory agencies.

7. That I have knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings as well as the Florida Administrative Code and Florida Statutes regarding evidence and the treatment of hearsay in an administrative setting. Further that I have knowledge of and will comply with the standards of conduct for persons appearing as qualified representatives before the Florida Department of Administrative Hearings as contained in the Florida Administrative Code.

FURTHER AFFIANT SAYETH NAUGHT.

Richard Karre

AFFIANT

SWORN TO AND SUBSCRIBED before me this 21st day of June, 1999, by the Affiant, **RICHARD KARRE, ESQ**, who: is personally known to me.

Saula L. Eden

NOTARY

(SEAL)

*My Commission Expires
11/18/01.*