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RECEIVED-FPSC

RECORDS AND REPORTING

OCT -4 PM 3:22

October 4, 1999
VIA Hand Delivery

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No. 990691-TP

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and 15 copies of ICG Telecom Group, Inc.'s Request for Representation by a Qualified Representative and Affidavit of Albert H. Kramer in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Yours truly,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

encl.
cc: Commissioner Susan Clark w/ encl.

- AFA _____
- APP _____
- CAF _____
- CMU Yavars
- CTR _____
- EAG _____
- LEG 2
- MAS 3
- OPC _____
- PAI 1
- SEC 1
- WAW _____
- OTH _____

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11937 OCT-4 99

FPSC-RECORDS/REPORTING

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition of ICG Telecom Group, Inc. for arbitration of unresolved issues in interconnection negotiations with BellSouth Telecommunications, Inc.

Docket No. 990691-TP

Filed: October 4, 1999

REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE

ICG Telecom Group, Inc. (ICG), through its undersigned counsel, and, submits its Request for Representation by a Qualified Representative pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. ICG is a telecommunications company which provides competitive circuit-switched local exchange and exchange access services. ICG's principal place of business is at 161 Inverness Drive West, Englewood, Colorado 80112.

2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request for Representation should be served upon the following individuals:

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden
Tallahassee, Florida 32301
(850)222-2525
(850)222-5606

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule

28-106.106(2)(a) requires that ICG submit a written request to the presiding officer in the event that ICG elects to be represented before the Commission by a qualified representative. ICG hereby submits such a request.

4. ICG seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of ICG for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No.990691-TP:

Albert H. Kramer
Dickstein Shapiro Morin & Oshinsky
2101 L Street, NW
Washington, DC 20037-1526
Phone: (202) 828-2226
Fax: (202) 887-0689

5. Consistent with Rule 25-106.106(2)(b), ICG hereby affirms that it is aware of the services Mr. Kramer can provide and, further, that ICG can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, ICG has elected to be represented in this matter by other attorneys in addition to Mr. Kramer.

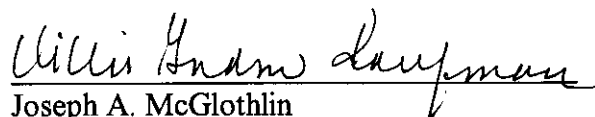
6. ICG submits that Mr. Kramer possesses the necessary qualifications to responsibly represent ICG's interests in this matter. In this regard, Mr. Kramer's qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Kramer's affidavit, he: (i) is an attorney admitted to practice in the District of Columbia; (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of

hearsay in an administrative proceeding.

8. Consistent with the standard set forth in Rule 28-106.107, Mr. Kramer has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of ICG is concerned in the above-referenced proceedings.

WHEREFORE, for the above and foregoing reasons, ICG requests that Mr. Kramer be permitted to appear as a qualified representative on behalf of ICG.



Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850)222-2525
Telecopy: (850)222-5606

Attorneys for ICG Telecom Group, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition of ICG Telecom
Group, Inc. for arbitration of
unresolved issues in
interconnection negotiations with
BellSouth Telecommunications,
Inc.

Docket No. 990691-TP

Filed: October 4, 1999

AFFIDAVIT OF ALBERT H. KRAMER

WASHINGTON, D.C.)
 ss:
)

I, Albert H. Kramer, being first duly sworn, do hereby depose and state as follows:

1. I am a partner in the law firm of Dickstein Shapiro Morin & Oshinsky. The firm's address is 2101 L Street, NW, Washington, DC

2. I am a member in good standing of the District of Columbia bar, and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.

3. I have served as regulatory counsel to ICG in proceedings before state commissions and before the Federal Communications Commission. Moreover, I have assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.

4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

I declare that the foregoing is true and correct based on my knowledge, information, and belief.



ALBERT H. KRAMER

SWORN TO AND SUBSCRIBED before me this 1st day of October, 1999 by Albert H. Kramer, who is personally known to me; or who has presented _____ as identification.

Marina M. Lauziere

Notary Public

Washington, D.C.

Commission Number:

My Commission expires:


MARINA M. LAUZIERE
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires March 14, 2001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy ICG Telecom Group, Inc.'s Request for Representation by a Qualified Representative and Affidavit of Albert H. Kramer by hand-delivery* and by U.S. mail this 4th day of October, 1999 to:

*Lee Fordham
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Gunter Building, Room 370
Tallahassee, FL 32399

Nancy B. White
Michael P. Goggin
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301


Vicki Gordon Kaufman