

MEMORANDUM

October 12, 1999

TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF LEGAL SERVICES (KEATING) *SK*

RE: DOCKET NO. 991267-TP - COMPLAINT AND/OR PETITION FOR ARBITRATION BY GLOBAL NAPS, INC. FOR ENFORCEMENT OF SECTION VI(B) OF ITS INTERCONNECTION AGREEMENT WITH BELLSOUTH TELECOMMUNICATIONS, INC., AND REQUEST FOR RELIEF.

On August 31, 1999, Global NAPS, Inc. filed a request for entry of an Order designating William J. Rooney, Esq. and Christopher W. Savage, Esq. as qualified representatives authorized to appear on behalf of Global NAPS, Inc. in Docket No. 991267-TP, pursuant to Rules 28-106.106 and 28-106.204, Florida Administrative Code. In determining whether the representative is qualified to appear, Rule 28-106.106(2)(b), Florida Administrative Code, states, in part, "[t]he presiding officer may consider a representative's sworn affidavit setting forth the representative's qualifications." The request filed by Global NAPS did not include affidavits from Messrs. Rooney and Savage setting forth their qualifications.

Cathy M. Sellers, Attorney for Global NAPS, Inc., was contacted on or about September 2, 1999, regarding the information necessary to determine the qualifications of the representatives. On October 12, 1999, the Division of Legal Services received, by hand delivery, affidavits from Messrs. Rooney and Savage setting forth their qualifications to appear as qualified representatives.

PLEASE INCLUDE THE ATTACHED AFFIDAVITS IN THE ABOVE-REFERENCED DOCKET FILE.

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____ BK/ALC
- LEG _____
- MAS _____ Attachments
- OPC _____
- PAI _____
- SEC 1 cc: Division of Communications (Marsh)
- WAW _____ I:991267m.alc
- OTH _____

DOCUMENT NUMBER-DATE

12474 OCT 13 99

FPSO-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Global NAPs, Inc., Against)
BellSouth Telecommunications, Inc., for)
Enforcement of Section VI(B) of its Interconnection)
Agreement with BellSouth Telecommunications, Inc.,)
and Request for Relief.)

Docket No. 99/267-TP

**AFFIDAVIT IN SUPPORT OF
MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR
ON BEHALF OF GLOBAL NAPs, INC.**

BEFORE ME, this day personally appeared Mr. William Rooney, who being duly sworn, deposes and says that the following information is true and correct, and within his personal knowledge.

1. Mr. Rooney is admitted to practice law in the states of Massachusetts and New Hampshire, and has practiced law for approximately 20 years.
2. Mr. Rooney is the General Counsel to Global NAPs, Inc. His address is 10 Merrymount Road, Quincy, MA 02169, telephone (617)507-5111.
3. Mr. Rooney is knowledgeable of the law pertaining to the jurisdiction of the Public Service Commission over this proceeding and with respect to other relevant jurisdictional issues/
4. Mr. Rooney is knowledgeable with respect to the Florida Rules of Civil Procedure with respect to discovery in this proceeding.
5. Mr. Rooney is knowledgeable with respect to the applicable rules of evidence in administrative proceedings in Florida, including the admissibility of, and weight given, hearsay evidence.

6. Mr. Rooney is knowledgeable with respect to the factual and legal issues in this proceeding.

7. Mr. Rooney is knowledgeable with, and will comply with, the Standards of Conduct applicable to Qualified Representatives set forth in Rule 28-106.107, Florida Administrative Code.

FURTHER AFFIANT SAYETH NAUGHT.

William J. Rooney
William J. Rooney

STATE OF MASSACHUSETTS
COUNTY OF NORFOLK

Sworn to and subscribed before me by William J. Rooney this 10 day of September, 1999.

He is personally known to me _____, -OR
He has produced _____ as identification.

John O. Postle
Notary Public
John O. Postle
(Print Name)

NOTARY STAMP

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

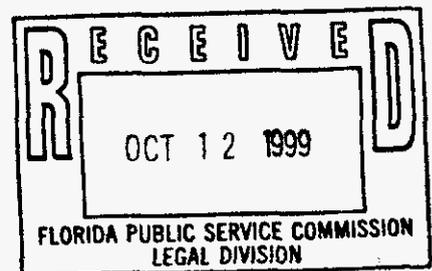
In re: Complaint of Global NAPs, Inc., Against)
BellSouth Telecommunications, Inc., for)
Enforcement of Section VI(B) of its Interconnection)
Agreement with BellSouth Telecommunications, Inc.,)
and Request for Relief.)
_____)

Docket No. 991267-TP

AFFIDAVIT IN SUPPORT OF
MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR
ON BEHALF OF GLOBAL NAPs, INC.

BEFORE ME, this day personally appeared Mr. Christopher W. Savage, who being duly sworn, deposes and says that the following information is true and correct, and within his personal knowledge.

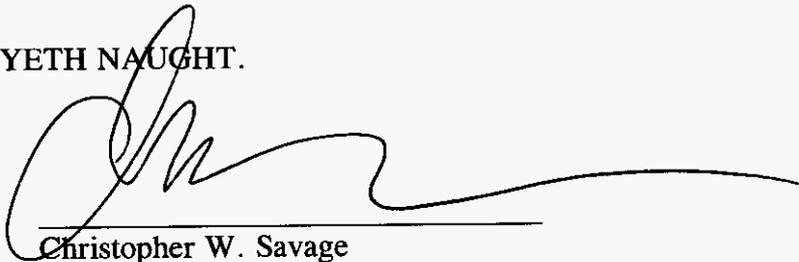
1. Mr. Savage is a partner in the Washing D.C., firm of Cole, Raywid, and Braverman, L.L.P., 1919 Pennsylvania Avenue, N.W., Washington D.C. 20006, telephone (202) 828-9811.
2. Mr. Savage is admitted to practice law in the District of Columbia and the State of California. Mr. Savage has practiced telecommunications law for approximately 14 years.
3. Mr. Savage is knowledgeable of the law pertaining to the jurisdiction of the Public Service Commission over this proceeding and with respect to other relevant jurisdictional issues/
4. Mr. Savage is knowledgeable with respect to the Florida Rules of Civil Procedure with respect to discovery in this proceeding.
5. Mr. Savage is knowledgeable with respect to the applicable rules of evidence in administrative proceedings in Florida, including the admissibility of, and weight given, hearsay evidence.



6. Mr. Savage is knowledgeable with respect to the factual and legal issues in this proceeding.

7. Mr. Savage is knowledgeable with, and will comply with, the Standards of Conduct applicable to Qualified Representatives set forth in Rule 28-106.107, Florida Administrative Code.

FURTHER AFFIANT SAYETH NAUGHT.

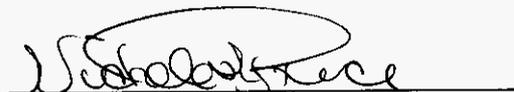


Christopher W. Savage

DISTRICT OF COLUMBIA

Sworn to and subscribed before me by Christopher Savage this 7th day of October, 1999.

He is personally known to me , OR
He has produced _____ as identification.



Notary Public

(Print Name)

Nichole Y. Rice
Notary Public District of Columbia
My Commission Expires June 30, 2000

NOTARY STAMP