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January 5, 2000

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OF COUNSEL ELIZABETH C, BOWMAN

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Blanca Bayó Director, Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Docket Nos. 981834-TP & 990321-TP Re: Rhythms' Qualified Representative Request for Kristin Smith

Dear Ms. Bayó:

CTR EAG LEG

MAS OPC

RRR SEC

MAW

or

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RDM/mee

OTH LEGEnclosure RECEIVED & FILED

This is the request of Rhythms Links Inc. ("Rhythms") pursuant to Rule 28-106.106, Florida Administrative Code, for authorization for the following person to appear as a Qualified Representative for Rhythms in Docket Nos. 981834-TP and 990321-TP:

> Kristin Smith Blumenfeld & Cohen 1625 Massachusetts Ave, NW Suite 300 Washington, DC 20036

As shown by the attached affidavit, Ms. Smith is a licensed attorney in good standing in the District of Columbia and meets the qualifications set out in Rule 28-106.106(4), Florida Administrative Code. She is thus able to represent Rhythms' AFA -interests in a manner that will not impair the fairness of this ADD proceeding or the correctness of the action to be taken. CAF CMU

BUREAU OF RECORDS

Respectfully submitted,

Pier Mu

Richard D. Melson

DOCUMENT NUMBER-DATE

00108 JAN-58

FPSC-RECORDS/REPORTING

AFFIDAVIT

The undersigned, first being duly sworn, states that:

- 1. She is associated with the law firm of Blumenfeld & Cohen which represents Rhythms Links Inc. (Rhythms) on regulatory matters throughout the country.
- 2. She possesses the necessary qualifications to responsibly represent Rhythms' interests in Docket Nos. 981834-TP and 990321-TP.
- 3. She is an attorney admitted to practice, and in good standing, in the District of Columbia (Bar No. 462932); has practiced before other utility regulatory agencies; has knowledge of the Florida Statutes relative to the jurisdiction of the Florida Public Service Commission (Commission); has knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; has knowledge of the rules of evidence, including the concept of hearsay in an administrative proceeding; has knowledge of the factual and legal issues in Docket Nos. 981834-TP and 990321-TP; and has knowledge of, and will comply with, the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.

ORIGINAL

Kristin Smith Blumenfeld & Cohen 1625 Massachusetts Avenue NW Suite 300 Washington, DC 20036

District of Columbia

Sworn to and subscribed before me this $\cancel{\mu}$ day of January, 2000, by Kristin Smith, who () is personally known to me OR () produced <u>Washungton</u>, DC Drivers License No. $\cancel{3/0} - \cancel{02} - \cancel{0424}$ as identification.

Notary Public, District of Columbia My Commission Expires January