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RECORDS AND REPORTING

MICHAEL P. GOGGIN  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

January 13, 2000

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

**Re: Docket No. 991267-TP (Global NAPS Complaint)**

Dear Ms. Bayó:

Enclosed is a Notice of Deposition for William J. Rooney, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Michael P. Goggin* (KR)  
Michael P. Goggin

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAE \_\_\_\_\_  
CMU Criser  
CTR I  
EAG \_\_\_\_\_  
LEG I  
MAS \_\_\_\_\_  
OPC \_\_\_\_\_  
RRR \_\_\_\_\_  
SEC I  
VAW \_\_\_\_\_  
OTH \_\_\_\_\_

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*[Signature]*  
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: ) Docket No. 991267-TP  
 )  
 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 )  
 \_\_\_\_\_ ) Filed: January 13, 2000

NOTICE OF DEPOSITION

TO: Jon C. Moyle, Jr.  
 Cathy M. Sellers  
 Moyle Flanigan Katz Kolins  
 Raymond & Sheehan, P.A.  
 118 North Gadsden Street  
 Tallahassee, FL 32301

NOTICE is hereby given that BellSouth Telecommunications, Inc. will take the deposition of the following named individual:

William J. Rooney

At the following location and time indicated:

**4:00 p.m., Tuesday, January 18, 2000**  
 Moyle Flanigan Katz Kolins  
 Raymond & Sheehan, P.A.  
 118 North Gadsden Street  
 Tallahassee, FL 32301

Please bring with you copies of all the work papers or other materials used by you in the preparation of any testimony filed in this docket.

NOTICE OF DEPOSITION – ROONEY  
DOCKET NO. 991267-TP  
PAGE 2

This deposition is being taken for purposes of discovery, for use at trial, or for any other purpose allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KE)

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey (KE)

R. DOUGLAS LACKEY

E. EARL EDENFIELD, JR.

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0747

cc: Court Reporter

192957

**CERTIFICATE OF SERVICE**  
**Docket No. 991267-TP**

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

Facsimile this 13th day of January, 2000 to the following:

Beth Keating  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6199  
Fax No. (850) 413-6250

  
Michael P. Goggin (KR)

Jon C. Moyle, Jr.  
Cathy M. Sellers  
Moyle Flanigan Katz Kolins  
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118 North Gadsden Street  
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Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
Represents Global NAPS

William J. Rooney  
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John O. Post  
Assistant General Counsel  
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