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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
Global NAPS SOUTH, INC.)
)
Petition For Arbitration of Interconnection)
Rates, Terms and Conditions and Related)
Relief of Proposed Agreement with BellSouth)
Telecommunications, Inc. under the)
Telecommunications Act of 1996)
_____)

Docket No. 991220-TP
Filed June 5, 2000

MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR
ON BEHALF OF GLOBAL NAPS, INC.

Pursuant to Rules 28-106.106 and 28-106.204, Florida Administrative Code (F.A.C.)
Global NAPS, Inc., respectfully moves the Commission to enter an Order designating Ellen
Deutsch, Esquire, as a Qualified Representative authorized to appear in the above-styled matter
on behalf of Global NAPS, Inc. The grounds for this motion are as follows:

1. Ms. Deutsch is admitted to practice law in the District of Columbia.
2. Ms. Deutsch has practiced law for approximately twenty-three years and is knowledgeable concerning the telecommunications law, the nature of these proceedings, and the applicable law. She will comply with the standards of conduct set forth in Rule 28-106.107, F.A.C.
3. The law firm of Moyle, Flanigan, et al., in conjunction with having Ms. Deutsch authorized to appear in the proceeding as a Qualified Representative, will ensure that Global NAPS, Inc., is well represented in the above-styled matter.

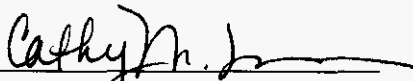
WHEREFORE, Global NAPS, Inc., respectfully requests the entry of an Order authorizing Ms. Deutsch to appear in this proceeding as Qualified Representative for Global NAPS, Inc.

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Done 6/14/00
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DOCUMENT NUMBER-DATE
06808 JUN-58
FPSC-RECORDS/REPORTING

Respectfully submitted,


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Fla. Bar No. 727016

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Christopher W. Savage

Cole, Raywid, & Braverman, L.L.P.

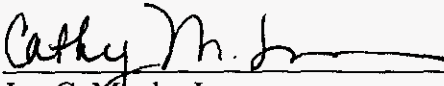
1919 Pennsylvania Avenue, N.W.

Washington, D.C. 20006

(202) 828-9811

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR ON BEHALF OF GLOBAL NAPS, INC. was furnished by U.S. Mail, Certified Return Receipt Requested, this 5th day of June, 1999, to Nancy White, General Counsel, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, FL 32301, Michael P. Goggin, BellSouth Telecommunications, Inc., Museum Tower, Suite 1910, 150 West Flagler Street, Miami, FL 33130, Phil Carver, BellSouth Telecommunications, Inc., BellSouth Center, Suite 4300, 675 W. Peachtree Street, N.E., Atlanta, GA 30375, and Beth Keating, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399.


Jon C. Moyle, Jr.

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

BEFORE ME, this day personally appeared Ms. Ellen S. Deutsch, who being duly sworn, deposes and says that the following information is true and correct, and within her personal knowledge.

1. Ms. Deutsch is admitted to practice law in the District of Columbia and has practiced law for approximately 23 years.
2. Ms. Deutsch 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.
3. Ms. Deutsch is knowledgeable regarding to the Florida Rules of Civil Procedure applicable to discovery in this proceeding.
4. Ms. Deutsch is knowledgeable regarding the applicable rules of evidence in administrative proceedings in Florida, including the admissibility of, and weight given, hearsay evidence.
5. Ms. Deutsch is knowledgeable with respect to the factual and legal issues in this

proceeding.

6. Ms. Deutsch is knowledgeable with respect to, and will comply with, the Standards of Conduct Applicable to Qualified Representatives set forth in Rule 28-106.107, Florida Administrative Code.

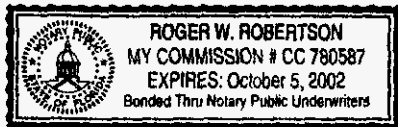
FURTHER AFFIANT SAYETH NAUGHT.

Ellen S. Deutsch
Ellen S. Deutsch

STATE OF FLORIDA
COUNTY OF MANATEE

Sworn to and subscribed before me by Ellen S. Deutsch this 2ND day of June, 2000.

She is personally known to me _____, OR
She has produced FLORIDA DRIVER LICENSE as identification.



Roger W. Robertson
Notary Public

ROGER W. ROBERTSON
(Print Name)

NOTARY STAMP