

ORIGINAL

MCWHIRTER REEVES
ATTORNEYS AT LAW

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:
TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

March 2, 2001

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.: 000121-TP

Dear Ms. Bayo:

I am enclosing the original and 15 copies of Z-Tel Communications, Inc.'s Motion for Leave to File Revised Testimony with attached Revised Direct Testimony of George S. Ford.

Please return a date stamped copy of this letter, the pleading and the testimony to me. Thank you for your assistance in this matter.

Yours truly,



Joseph A. McGlothlin

- APP _____
- CAF _____
- CMP _____
- COM _____
- CTR _____ JAM/kmr
- ECR _____ Enclosure
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC _____
- SER _____
- OTH _____

RECEIVED & FILED

Laur
FPSC BUREAU OF RECORDS

Motion
DOCUMENT NUMBER-DATE

02836 MAR 20

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, TAUFELMAN, BARNETT & STEEN, P.A.

FPSC-RECORDS/REPORTING

Rev Test
DOCUMENT NUMBER-DATE
02837 MAR 20
FPSC-RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the Establishment of
Operations Support Systems Permanent
Performance Measures for Incumbent Local
Exchange Telecommunications Companies

Docket No.: 000121-TP
Date: March 2, 2001


MOTION FOR LEAVE TO FILE REVISED TESTIMONY

Z-Tel Communications, Inc. ("Z-Tel"), through its undersigned counsel, moves for leave to submit the Revised Direct Testimony of George S. Ford (attached), and states:

1. On March 1, 2001, Z-Tel timely filed the testimony of witnesses John Rubino and George S. Ford.
2. On the afternoon of March 1, when the final changes and edits that had been communicated by witness Ford to his undersigned counsel were being built into his prefiled testimony, two computers—including the one being used to prepare the testimony—seized and failed simultaneously. As a result, numerous edits that had already been built into the document were lost. Efforts were made to restore the material within the time available, but due to production complications and errors only a portion of the edits were included in the testimony that was filed on March 1, 2001.
3. The Revised Direct Testimony that is attached to this motion includes all of the edits and changes that had been made prior to the computer failure. The changes are in the nature of a fine tuning of language and, in places, a more complete exposition of the witness' points.
4. Z-Tel submits that no party will be prejudiced by the substitution of the revised testimony

for the testimony that was filed on March 1, 2001. The revised testimony will be hand delivered or faxed to BellSouth, Verizon, Sprint, and Staff on this date, which in all likelihood will be on or before the date on which they receive the testimony that was served by mail on March 1, 2001.

WHEREFORE, Z-Tel requests leave to submit the Revised Direct Testimony of George S. Ford.


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

Attorneys for Z-Tel Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Z-Tel's Motion for Leave to File Revised Testimony has been furnished by hand delivery(*), facsimile (**), or U.S. mail on this 2nd day of March, 2001 to:

(*)Tim Vaccaro
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

(*)Marsha Rule
AT&T
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301-1549

(*)Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Nanette Edwards
ITC Deltacom
4092 South Memorial Parkway
Huntsville, AL 35802

(*)Patrick Wiggins/Charles J. Pellegrini
Katz, Kutter, Haigler, Alderman,
Bryant & Yon, P.A.
Post Office Box 1877
Tallahassee, Florida 32302

Catherine Boone
Covad Communications Company
Ten Glenlake Parkway
Suite 650
Atlanta, Georgia 30328

(*)Floyd Self
Messer, Capareello & Self, P.A.
215 South Monroe Street, Suite 701
Tallahassee, Florida 32302-1876

Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2005

Michael A. Gross
Florida Cable Telecommunications
Association
246 E. 6th Avenue
Tallahassee, FL 32303

(**)Kimberly Caswell
GTE Florida Incorporated
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110

Scott A. Sapperstein
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309

(*)Jeffrey Wahlen
Ausley Law Firm
Post Office Box 391
Tallahassee, Florida 32301

Donna Canzano McNulty
MCI WorldCom, Inc.
325 John Knox Road, Suite 105
Tallahassee, Florida 32303

Glenn Harris
North Point Communications, Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108

(*)Kenneth Hoffman/John Ellis
Rutledge Law Firm
Post Office Box 551
Tallahassee, Florida 32302

Andrew Isar
Telecommunications Resellers Assoc.
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335

(*)Charles J. Rehwinkel/Susan Masterton
Sprint-Florida, Incorporated
P.O. Box 2214
Tallahassee, FL 32316-2214

John Kerkorian
5607 Glenridge Drive
Suite 310
Atlanta, Georgia 30342

Mark E. Buechele
Koger Center
Ellis Building
Suite 200
1311 Executive Center Drive
Tallahassee, Florida 32301-5027

(*) Lisa Harvey
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gunter Building, Room 235-D
Tallahassee, Florida 32399-0850

Monica M. Barone, Director
State Regulation
Birch Telecom of the South, Inc.
8601 Six Forks Road, Suite 463
Raleigh, NC 27516

(*)Peter Dunbar/Karen Camechis
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302

Laura L. Gallagher
Laura L. Gallagher, P.A.
101 East College Avenue, Suite 302
Tallahassee, Florida 32301

(*)Angela Green, General Counsel
Florida Public Telecommunications Assoc.
125 S. Gadsden Street, Suite 200
Tallahassee, Florida 32301-1525

(*)Bruce May
Holland Law Firm
Post Office Drawer 810
Tallahassee, Florida 32302

Jonathan E. Canis
Michael B. Hazzard
Kelly Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, D.C. 20036

Stephen P. Bowen
Blumfield & Cohen
4 Embarcadero Center, Suite 1170
San Francisco, CA 94111

(*)Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 S. Monroe Street, Suite 701
Tallahassee, Florida 32301-1876


Joseph A. McGlothlin