

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
Global NAPS SOUTH, INC.)
Petition for Arbitration Pursuant to)
47 U.S.C. §252(b) of Interconnection)
Rates, Terms and Conditions with)
Sprint - Florida)

Docket No. 011172
Filed September 6, 2001

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COMMISSION
CLERK

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 Karlyn
D. Stanley, 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. Stanley is admitted to practice law in the State of Virginia and the District
of Columbia
2. Ms. Stanley has practiced law for approximately 17 years and is knowledgeable
concerning the telecommunications law, the nature of these proceedings, and the applicable
law. Due to her extensive experience in the practice of law, she is familiar with the rules of
evidence. She is also knowledgeable of the Florida Rules of Civil Procedure and the
applicable rules of evidence in administrative proceedings in Florida, including the
admissibility of, and weight given hearsay evidence. Furthermore, she is knowledgeable with
respect to the factual and legal issues in this proceeding. She will comply with the standards

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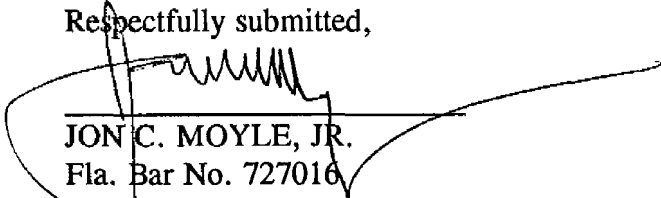
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of conduct set forth in Rule 28-106.107, F.A.C. Please see the affidavit attached as Exhibit A.

3. The law firm of Moyle, Flanigan, et al., in conjunction with having Ms. Stanley authorized to appear in the proceeding as a Qualified Representative, will work to 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. Stanley to appear in this proceeding as Qualified Representative for Global NAPs, Inc.

Respectfully submitted,



JON C. MOYLE, JR.
Fla. Bar No. 727016
MOYLE FLANIGAN KATZ
RAYMOND & SHEEHAN, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828

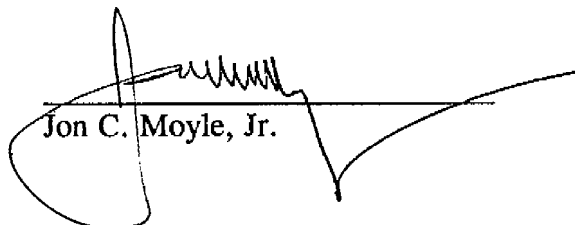
KARLYN D. STANLEY
COLE, RAYWID, & BRAVERMAN, L.L.P.
1919 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 828-9811

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, this 6th day of September, 2001 to:

Charles R. Rehwinkle, Esquire
Sprint - Florida
1313 Blair Stone Road
Tallahassee, Florida 32316

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399


Jon C. Moyle, Jr.

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_____)

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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 Karlyn D. Stanley, who being duly sworn, deposes and says that the following information is true and correct, and within her personal knowledge.

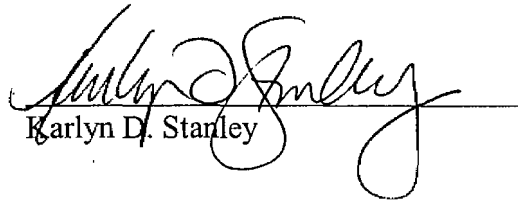
1. Ms. Stanley is admitted to practice law in Virginia and has practiced law for approximately 17 years.
2. Ms. Stanley is knowledgeable of the law pertaining to the jurisdiction of the Public Service Commission over this proceeding and with respect to other relevant jurisdictional issues.
3. Ms. Stanley is knowledgeable regarding to the Florida Rules of Civil Procedure applicable to discovery in this proceeding.
4. Ms. Stanley is knowledgeable regarding the applicable rules of evidence in administrative proceedings in Florida, including the admissibility of, and weight given, hearsay evidence.



5. Ms. Stanley is knowledgeable with respect to the factual and legal issues in this proceeding.

6. Ms. Stanley 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.

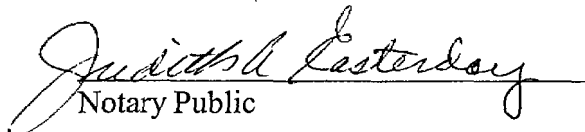
FURTHER AFFIANT SAYETH NAUGHT.


Karlyn D. Stanley

STATE OF District of Columbia
COUNTY OF _____

Sworn to and subscribed before me by Karlyn D. Stanley this 5th day of September, 2001.

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


Notary Public

Judith A. Easterday
(Print Name)

Judith A. Easterday
Notary Public, District of Columbia
My Commission Expires 6-14-04

NOTARY STAMP