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Via Overnight Delivery

June 5, 2002

Ms. Blanca Bayō
Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

020504-TI

RE: Petition of Legent Communications Corporation d/b/a Long Distance America (holder of IXC Certificate No. 8090) for Waiver of Interexchange Carrier Selection Requirements of Rule 25-4.118 F.A.C., for acquisition of customer base and related assets of CEO Telecommunications, Inc. (holder of IXC Certificate No. 4073), and Request for Cancellation of IXC Certificate 4073 held by CEO, Docket No. 020504-TI

Dear Ms. Bayō:

Legent Communications Corporation d/b/a Long Distance America ("Legent"), by its regulatory consultant, hereby requests interim Florida Public Service Commission ("Commission") authority for Legent to adopt in its entirety, and as Legent's own tariff, CEO Telecommunications, Inc.'s ("CEO" f/k/a L.D. Services, Inc. d/b/a L.D.S. Telecommunications, Inc.) Florida interexchange tariff, *Tariff FL P.S.C. No. 1*, on or before July 15, 2002,¹ in conjunction with the above-referenced matter. In support of its request, Legent states as follows.

On June 11, 2002, Legent filed a petition for waiver of the Commission's interexchange carrier selections rules associated with Legent's acquisition and transfer of CEO's customer base and related assets.² This matter was assigned Docket No. 020504-TI. By separate letter filed on behalf of CEO contemporaneously with Legent's *Petition*, CEO requested authority to discontinue service upon successful completion of the CEO customer base transfer to Legent.³ CEO further requested withdrawal of its tariff, *Tariff FL P.S.C. No. 1* pursuant to Rule 25-9.045.

¹ The anticipated date when CEO subscribers are to be transferred to Legent.

² See, *Petition of Legent Communications Corporation d/b/a Long Distance America For Waiver of Interexchange Carrier Selection Rules, 25-4.118 F.A.C.*, Docket No. 020504-TI (June 11, 2002) ["*Petition*"].

³ See, *Notification of Cancellation of a Certificate Pursuant to 25-24.474(2) F.A.C. by CEO Telecommunications, Inc.*, Docket No. 020504-TI (June 11, 2002).

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Legent now respectfully requests interim Commission authority for Legent to adopt CEO's *Tariff FL P.S.C. No. 1.*, in its entirety, as Legent *Tariff FL P.S.C. No. 2.*, in order to maintain a seamless transition of CEO subscribers to Legent in the most expeditious and cost effective manner, while enabling Legent to remain fully compliant with its regulatory obligations.

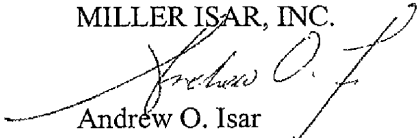
CEO customers were informed of the acquisition of CEO assets by Legent on or about June 7, 2002.⁴ CEO subscribers were informed that Legent would become their presubscribed primary interexchange carrier, and that CEO subscribers' current service features and rates would not change. The anticipated asset transfer date is July 15, 2002. Through the immediate adoption of CEO's *Tariff FL P.S.C. No. 1* as Legent's *Tariff FL P.S.C. No. 2*, Legent may continue the provision of services to CEO subscribers under CEO subscribers' current rates, terms, and conditions during an interim period, as Legent begins to migrate subscribers on to its own service offerings, without further amendment of Legent's current tariff. Such tariff adoption authority assures the Commission that CEO subscribers will continue to be served under CEO's Commission approved rates, terms, and conditions, during an interim subscriber migration period, obviating the need for costly, temporary amendments to Legent's tariff which would require separate Commission review, approval, and potential delay. Adoption of the CEO tariff by Legent further allows the creation of a separate, discrete interim tariff that will enable Legent to remain in immediate compliance with its regulatory obligations during the transitory subscriber migration period. Once the CEO subscriber base has been fully migrated on to Legent's service plans, Legent will request that the adopted CEO tariff be cancelled. The adoption of CEO's tariff by Legent would be transparent to CEO subscribers and the public.

Legent believes that the requested authority enables Legent to fully, timely, and cost effectively meet its regulatory obligations with a minimum of administrative review by the Commission, and without any impact on CEO subscribers or the public. Legent respectfully requests that it be authorized to adopt CEO's *Tariff FL P.S.C. 1* in its entirety, as Legent interim *Tariff FL P.S.C. 2*, effective no later than July 15, 2002.

An original and six (6) copies this letter are attached. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.



Andrew O. Isar

Enclosures

cc: Scott A. White

⁴ See *Petition, Attachment.*