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November 12, 2002

Ms. Blanca S. Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket 000075-TP (Phase IIA)  
Investigation into appropriate methods to compensate carriers for exchange  
of traffic subject to Section 251 of the Telecommunications Act of 1996.

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and 15 copies of  
Verizon Florida Inc.'s Motion to Strike Notice of Adoption by Global NAPS, Inc. of  
AT&T Communications of the Southern States, LLC, TCG of South Florida, and  
AT&T Broadband Phone of Florida, LLC's Motion for Reconsideration. Service  
has been made as indicated on the Certificate of Service. If there are any  
questions regarding this matter, please contact me at 813-483-2617.

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM 5  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC 1  
OTH \_\_\_\_\_

Sincerely,

Kimberly Caswell

KC:wjh  
Enclosure

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DISTRIBUTION CENTER

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R.V.D.  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12347 NOV 12 08  
FPSC-COMMISSION CLERK

# ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate methods )  
 to compensate carriers for exchange of traffic )  
 traffic subject to Section 251 of the )  
 Telecommunications Act of 1996 )  
 \_\_\_\_\_ )

Docket No. 000075-TP (Phase IIA)  
 Filed: November 12, 2002

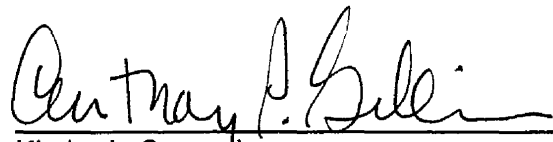
**VERIZON FLORIDA INC.'S MOTION TO STRIKE NOTICE OF ADOPTION BY GLOBAL  
 NAPS, INC. OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC, TCG OF  
 SOUTH FLORIDA, AND AT&T BROADBAND PHONE OF FLORIDA, LLC'S  
MOTION FOR RECONSIDERATION**

Verizon Florida Inc. (Verizon) asks the Commission to strike the Notice of Adoption by Global NAPS, Inc. (GNAPs) of AT&T Communications of the Southern States, LLC, TCG of South Florida, and AT&T Broadband Phone of Florida, LLC's Motion for Reconsideration. GNAPs' Notice is improperly filed because it is weeks late.

The final Order in this Docket was issued on September 10, 2002. Reconsideration petitions were due on September 25, 2002. Responses to those petitions were due 7 days later, with 5 additional days permitted if the reconsideration petition was served by mail.

Because GNAPs intended to adopt as its own AT&T's Motion for Reconsideration, GNAPs' Notice should have been filed when AT&T's Motion was, on September 25, 2002. Even if GNAPs' Notice is considered a response to AT&T's Motion, it should have been filed by October 7, 2002. Instead, GNAPs filed its Notice on October 31, 2002. Even under the most liberal interpretation of the Commission's Rules, GNAPs' filing is over three weeks late. It is thus improper and should be stricken.

Respectfully submitted on November 12, 2002.

By:   
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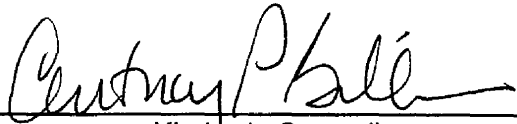
Attorney for Verizon Florida Inc.  
 DOCUMENT NUMBER-DATE

12347 NOV 12 02

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Motion to Strike Notice of Adoption by Global NAPS, Inc. of AT&T Communications of the Southern States, LLC, TCG of South Florida, and AT&T Broadband Phone of Florida, LLC's Motion for Reconsideration in Docket No. 000075-TP (Phase IIA) were sent via U.S. mail on November 12, 2002 to the parties on the attached list.

  
\_\_\_\_\_  
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