

# AUSLEY & McMULLEN

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ORIGINAL

January 6, 2003

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COMMISSION  
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## BY HAND DELIVERY

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

Re: Docket No. 011354-TP

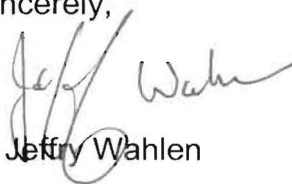
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Motion for Qualified Representative to Appear on Behalf of ALLTEL Florida Inc.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM 3 Enclosures  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_ cc: All parties of record  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_ h:\jjw\all\011354\bayo.ltr.010603.doc  
MMS \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH \_\_\_\_\_  
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORDIA PUBLIC SERVICE COMMISSION**

In the Matter of: )  
Global NAPs, Inc. ) Docket No. 011354-TP  
Petition for Arbitration Pursuant to ) Filed: January 6, 2003  
47 U.S.C. § 252(b) of Interconnection, )  
Rates, Terms and Conditions with )  
ALLTEL Florida, Inc. )  
\_\_\_\_\_ )

**MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR  
ON BEHALF OF ALLTEL FLORIDA, INC.**

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

1. Mr. Refsell is admitted to practice law in Minnesota.
2. Mr. Refsell has practiced law for 32 years and is knowledgeable concerning the telecommunications law, the nature of these proceedings, and the applicable law. Due to his extensive experience in the practice of law, he is familiar with the rules of evidence. He will comply with the standards of conduct set forth in Rule 28-106.107, F.A.C.
3. The law firm of Ausley & McMullen, P.A., in conjunction with having Mr. Refsell authorized to appear in the proceeding as a Qualified Representative, will ensure that ALLTEL is well represented in the above-styled matter.

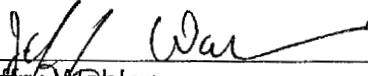
WHEREFORE, ALLTEL respectfully requests the entry of an Order authorizing Stephen Refsell to appear in this proceeding as Qualified Representative for ALLTEL Florida, Inc.

DATED this 6<sup>th</sup> day of January, 2003.

ALLTEL Florida, Inc.

Stephen T. Refsell  
Vice President - Law  
ALLTEL Corporate Services, Inc.  
One Allied Drive  
Little Rock, AR 72202  
501-905-5637 (Telephone)  
501-905-5489 (Fax)

and

  
\_\_\_\_\_  
J. Jeffrey Wahlen  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302  
or  
227 South Calhoun  
Tallahassee, FL 32301  
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jwahlen@ausley.com

Attorneys for ALLTEL Florida, Inc.

**CERTIFICATE OF SERVICE**

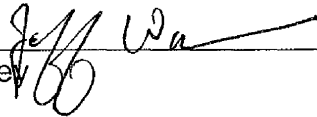
I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 6<sup>th</sup> day of January, 2003, to the following:

Adam Tietzman \*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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\_\_\_\_\_  
Attorney

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