



ORIGINAL

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1311 Executive Center Drive, Suite 200  
Tallahassee, FL 32301-5027

January 29, 2003

Mrs. Blanca Bayo, Director  
Division of Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 323099-0850

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JAN 29 PM 4:10  
COMMISSION CLERK

RE: ~~Docket No. 021249-TP~~ Complaint of Supra Telecommunications Systems, Inc., Against BellSouth Telecommunications, Inc. For Non-Compliance With Commission Order No. PSC-02-0878-FOF-TP

Dear Mrs. Bayo:

Enclosed is the original and seven (7) copies of Supra Telecommunications and Information Systems, Inc.'s (Supra) requests that Steven B. Chaiken, Assistant General Counsel, be named a qualified representative of Supra in the above captioned docket.

We have enclosed a copy of this letter and ask that you mark it to indicate that the original was file, and thereupon return it to me, copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Jorge L. Cruz - Bustillo / AAS*  
Jorge L. Cruz-Bustillo  
Assistant General Counsel

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
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- OPC \_\_\_\_\_
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

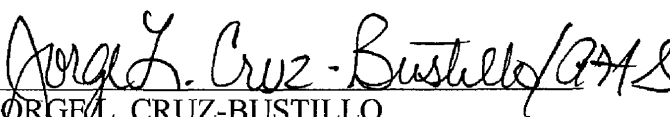
**Docket No. 021249-TP**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served via Hand-Delivery, Facsimile, or U.S. Mail on this 29<sup>th</sup> day of January 2003, to the following:

Patricia Christensen, (for staff counsel)  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Nancy B. White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301

SUPRA TELECOMMUNICATIONS &  
INFORMATION SYSTEMS, INC.  
2620 S. W. Avenue  
Miami, Florida 33133  
Telephone (305) 476 – 4252  
Facsimile (305) 443 - 9516

  
JORGE L. CRUZ-BUSTILLO

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of Supra	)	
Telecommunications & Information Systems,	)	
Inc., against BellSouth	)	Docket No.: 021249-TP
Telecommunication, Inc.'s for Non-Compliance	)	
with Commission Order No.	)	
PSC-02-0878-FOF-TP	)	Filed: January 29, 2003
_____	)	

**REQUEST FOR REPRESENTATION BY QUALIFIED REPRESENTATIVE**

**SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.** ("Supra"),  
by and through its undersigned counsel, submits its Request for Representation by Qualified Representative pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. Supra is a competitive local exchange carrier and provides service in the state of Florida. Supra's primary place of business is located at 2620 SW 27<sup>th</sup> Ave., Miami, FL, 33133.
2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request should be served upon the following individuals:

Brian W. Chaiken, General Counsel  
Steven B. Chaiken, Assistant General Counsel  
Jorge L. Cruz-Bustillo, Assistant General Counsel  
Supra Telecommunications & Information Systems, Inc.  
2620 SW 27<sup>th</sup> Ave  
Miami, FL 33133-3005

3. This Request is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2) requires that Supra submit a written request to the presiding officer in the event that Supra elects to be represented before the Commission by a qualified representative. Supra hereby submits such a request.

4. Supra seeks leave of the presiding officer for Steven B. Chaiken, Esq. to appear as a qualified representative on behalf of Supra for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 021249-TP.

5. Consistent with Rule 28-106.106(2)(b), Supra hereby affirms that it is aware of the services Mr. Chaiken can provide and, further, that Supra can elect to be represented solely by "counsel," as that term is defined by Rule 106.106(1).

6. Supra submits that Mr. Chaiken possesses the necessary qualifications to responsibly represent Supra's interests in this matter. In this regard, Mr. Chaiken's qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Chaiken's affidavit, he: (i) is an attorney admitted to practice in the State of Illinois, (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction; (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence.

8. Consistent with the standard set forth in Rule 28-106.107, Mr. Chaiken has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Supra is concerned in the above-referenced proceeding.

WHEREFORE, for the foregoing reasons, Supra respectfully requests that Mr. Chaiken be permitted to appear as a qualified representative on behalf of Supra.

RESPECTFULLY SUBMITTED this 29<sup>th</sup> day of January 2003.

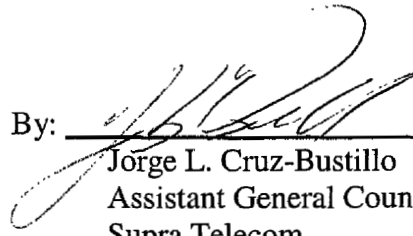
SUPRA TELECOMMUNICATIONS &  
INFORMATION SYSTEMS, INC.

2620 S.W. 27<sup>th</sup> Ave.

Miami, Florida 33133

Telephone: 305.476.4252

Facsimile: 305.443.1078

By:   
\_\_\_\_\_  
Jorge L. Cruz-Bustillo  
Assistant General Counsel  
Supra Telecom

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

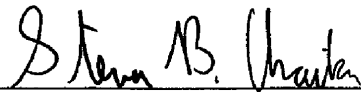
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with Commission Order No.	)	
PSC-02-0878-FOF-TP	)	Filed: January 29, 2003

**AFFIDAVIT OF STEVEN B. CHAIKEN**

I, Steven B. Chaiken, do solemnly swear that I am over the age of eighteen, competent to testify and have personal knowledge of the facts set forth herein.

1. I am an assistant general counsel for Supra Telecommunications & Information Systems, Inc. ("Supra"), 2620 SW 27<sup>th</sup> Ave., Miami, FL 33133.
2. I am a member of good standing of the Northern District of Illinois and the Illinois State Bar and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.
3. I am familiar with the factual and legal issues involved in this docket.
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

I declare that the foregoing is true and correct based on my knowledge, information and belief.

  
\_\_\_\_\_  
Steven B. Chaiken

STATE OF FLORIDA                    )  
  ) SS:  
COUNTY OF MIAMI-DADE            )

The execution of the foregoing instrument was acknowledged before me this \_\_\_\_\_ day of ~~January~~ 28, 2003, by Steven B. Chaiken, who  is personally known to me or who  produced \_\_\_\_\_ as identification and who did take an oath.

My Commission Expires:

  
NOTARY PUBLIC  
State of Florida at Large

Print Name:

