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REDACTED

June 9, 2003

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COMMISSION
CLERK

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

RE: Docket No. 030349-TP: SUPRA'S MOTION FOR LEAVE TO AMEND ITS EMERGENCY PETITION FOR EXPEDITED REVIEW AND CANCELLATION OF BELL SOUTH'S \$75 CASH BACK PROMOTION TARIFFS (T-030132) AND FOR INVESTIGATION INTO BELL SOUTH'S PROMOTIONAL PRICING AND MARKETING PRACTICES

Dear Mrs. Bayo:

Enclosed is the original and seven (7) copies of Supra Telecommunications and Information Systems, Inc.'s (Supra) Motion For Leave To Amend its, and an Amended Emergency Petition For Expedited Review and Cancellation of BellSouth's \$75 Cash Back Promotion Tariffs (T-030132) and For Investigation into BellSouth's Promotional Pricing and Marketing Practices. Confidentiality is being claimed for portions of the aforementioned Amended Petition.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return it to me.

Sincerely,

RECEIVED & FILED
Th
FPSC-BUREAU OF RECORDS

Jorge Cruz-Bustillo / JWB

Jorge Cruz-Bustillo
Assistant General Counsel

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
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OPC _____
MMS _____
SEC 1 _____
OTH _____

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 05121-03. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

(See DNs 03599-03 + 04226-03)

DOCUMENT NUMBER-DATE

05120 JUN-9 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

Docket No. 030349-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Facsimile, Hand Delivery U.S. Mail and/or Federal Express this 9th day of June, 2003 to the following:

Linda Dodson, Esq. for:
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy B. White, Esq.
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL. 32301
(850) 222-1201 (voice)
(850) 222-8640 (fax)

SUPRA TELECOMMUNICATIONS
& INFORMATION SYSTEMS, INC.
2620 S.W. 27th Avenue
Miami, Florida 33133
Telephone: (305) 476-4240
Facsimile: (305) 443-9516

By: Jorge Cruz-Bustillo
JORGE CRUZ-BUSTILLO, ESQ.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Supra Telecommunications)
and Information Systems, Inc., for Expedited)
Review and Cancellation of BellSouth) Docket No. 030349-TP
Telecommunications, Inc.'s \$75 Cash Back)
Promotional Tariffs (T-030132) and For)
Investigation into BellSouth Telecommunications,)
Inc.'s Promotional Pricing and Marketing Practices) Filed: June 9, 2003
_____)

MOTION FOR LEAVE TO AMEND

**EMERGENCY PETITION OF SUPRA TELECOMMUNICATIONS AND INFORMATION
SYSTEMS, INC., FOR EXPEDITED REVIEW AND CANCELLATION OF BELLSOUTH
TELECOMMUNICATIONS, INC.'S \$75 CASH BACK PROMOTION TARIFFS (T-030132)
AND FOR INVESTIGATION INTO BELLSOUTH TELECOMMUNICATIONS, INC.'S
PROMOTIONAL PRICING AND MARKETING PRACTICES**

Supra Telecommunications and Information Systems, Inc., (“Supra”) by and through its undersigned counsel hereby files this MOTION to seek Leave To Amend the above styled complaint. In support thereof, Supra states as follows:

An issue identification meeting was held on Friday, June 6, 2003. At that time, Supra proposed only to raise four issues all involving BellSouth’s violation of 47 USC § 222, Section 364.01(4)(g), Florida Statutes and Florida Public Service Commission (“Commission”) policy, even though the Complaint did allege other anti-competitive violations by BellSouth’s Cash Back marketing programs. The Commission Staff suggested that Supra file an Amended Complaint focusing only on those issues involving violations of 47 USC §222, Section 364.01(4)(g), Florida Statutes, and Commission policy. All three violations arise from the same set of facts. BellSouth indicated that they would not object to Supra filing a Motion to Amend the Complaint to remove the cash back issues from this docket. BellSouth also indicated that they would not use the filing of the Amended Complaint as a basis to seek a continuance of the current hearing date scheduled for August 29, 2003.

**MOTION FOR LEAVE TO AMEND Supra's Petition for Expedited Review
and Cancellation of BellSouth's \$75 Cash Back Promo - Tariff in T - 030132**

WHEREFORE, for the foregoing reasons, Supra respectfully requests that this Commission grant Supra leave to amend the current complaint.

RESPECTFULLY SUBMITTED this 9th day of June 2003.

SUPRA TELECOMMUNICATIONS
& INFORMATION SYSTEMS, INC.
2620 S.W. 27th Avenue
Miami, Florida 33133
Telephone: (305) 476-4248
Facsimile: (305) 443-9516

By: Jorge Cruz-Bustillo/JWA
JORGE L. CRUZ-BUSTILLO

**MOTION FOR LEAVE TO AMEND Supra's Petition for Expedited Review
and Cancellation of BellSouth's \$75 Cash Back Promo - Tariff in T - 030132**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was delivered by Hand Delivery, Facsimile, Federal Express or U.S. Mail to the persons listed below this 9TH day of June 2003.

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

Ms. Linda Dodson
Legal Division
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

By: Jorge Cruz-Bustillo/JWA
JORGE L. CRUZ-BUSTILLO