

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of)
unbundled network elements)
_____)

Docket No. 990649B-TP
Filed: September 8, 2003

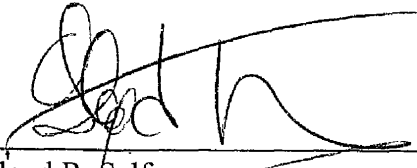
JOINT REQUEST FOR ORAL ARGUMENT OF
FLORIDA DIGITAL NETWORK, INC. AND
KMC TELECOM III, LLC

Florida Digital Network, Inc. (“FDN”) and KMC Telecom III, LLC (“KMC”), pursuant to Rule 25-22.060, Florida Administrative Code, hereby request oral argument on their Alternative Motion to Stay the Final Order on Rates for Unbundled Network Elements Provided by Sprint-Florida Incorporation (“Motion”) being filed contemporaneously with this Joint Request. FDN and KMC believe that oral argument would assist the Commission in comprehending and evaluating the issues raised by their Motion.

The substance of the Motion is the meaning and effect of the Commission’s decision in Order No. PSC-03-0058 (Jan. 8, 2003) as requiring voluntary, negotiated amendments to implement the decision. The Motion alternatively requests that if the Commission determines the new Sprint UNE rates are self-executing, that the Commission grant a stay of that decision. The facts and issues associated with a stay can be very company-specific and fact-specific. Without oral argument, the Commissioners will be less likely to have answers to all of their questions on the issues relating to the granting of a stay. Accordingly, only through oral argument will there be assurances that the record will be complete, thus allowing the Commission to make the necessary findings in the public interest on those issues.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'F. Self', written over a horizontal line.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by U. S. Mail this 8th day of September, 2003.

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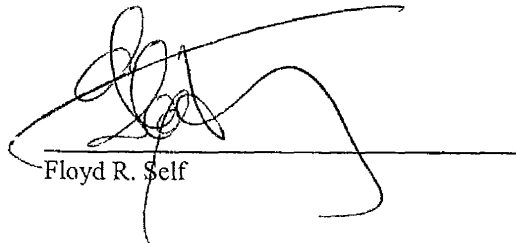
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