



September 15, 2003

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

via Overnight Mail

Re: Docket No. ⁰³⁰⁸²⁹080329-TP Complaint of FDN Communications for Resolution of
Certain Billing Disputes and Enforcement of UNE Orders and Interconnection
Agreements with BellSouth Telecommunications, Inc.

Dear Ms. Bayo:

Enclosed please find an original and seven (7) copies of FDN Communications' requests
that Scott A. Kassman, Assistant General Counsel, be named a qualified representative of
FDN in the aforementioned Docket No. 080329-TP.

Mr. Kassman is located at 390 North Orange Avenue, Suite 2000, Orlando, Florida,
32810, and may be reached at 407-447-6636.

Sincerely,

Matthew Feil
General Counsel

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
DPC _____
VMS _____
SEC
DTH _____

LOCAL

LONG DISTANCE

390 North Orange Avenue Suite 2000 Orlando, FL 32801
407 835 0300 Fax 407 835.0309 www.fdn.com

DOCUMENT FILED DATE

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FPSC-COMMISSION CLERK

“counsel,” as that term is defined by Rule 28-106.106(1). FDN will also be represented by its General Counsel, Matthew Feil, Esq., in this proceeding.

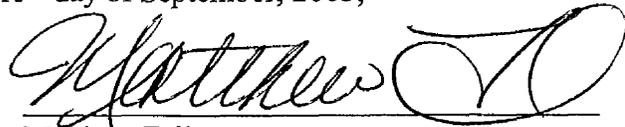
4. FDN submits that Mr. Kassman possesses the necessary qualifications to responsibly represent FDN interest in this matter. In this regard, Mr. Kassman’s qualifications are set forth in the attached affidavit.

5. As reflected in Mr. Kassman’s affidavit, he is: (i) an attorney admitted to practice in the State of New Jersey; (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, including the concept of hearsay in an administrative proceeding.

6. Mr. Kassman will conduct himself consistent with the standards set forth in Rule 28-106.107, and Mr. Kassman has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of FDN is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, FDN requests that Mr. Kassman be permitted to appear as qualified representatives on behalf of FDN.

Respectfully submitted this 15th day of September, 2003,



Matthew Feil
General Counsel
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
(407) 835-0460

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing was served on the following by overnight delivery this 15th day of September, 2003.

Ms. Nancy B. White/Mr. James Meza, III
C/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
nancy.sims@bellsouth.com

Ms. Beth Keating
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
bkeating@psc.state.fl.us

Mr. R. Douglas Lackey/Ms. Meredith E. Mays
BellSouth Telecommunications, Inc.
675 West Peachtree Street, N.E.
Suite 4300
Atlanta, GA 30375



Matthew Feil
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
(407) 835-0460

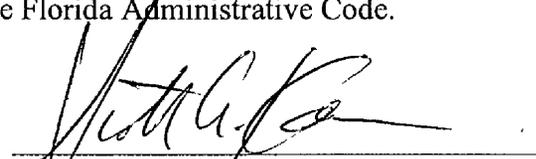
AFFIDAVIT

Undersigned counsel, being first duly sworn, states that:

Undersigned counsel is currently employed by FDN Communications as Assistant General Counsel, at the address and phone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent FDN Communications' interests in Docket No. 030829-TP.

Undersigned counsel is an attorney admitted to practice, and a member in good standing of the State of New Jersey, Bar No. 5090-98; has practiced before other utility regulatory agencies or authorities; has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction; has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding; has acquired or will acquire knowledge of the factual and legal issues in this matter; and has reviewed the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.



Scott A. Kassman, Esq.
Assistant General Counsel
390 North Orange Avenue
Suite 2000
Orlando, FL 32810
Telephone: 407-447-6636
Facsimile: 407-447-4839

State of Florida
County of Orange

Affirmed and subscribed before me this 12th day of September, 2003.

 Carol A. Kelley
My Commission CC953890
Expires August 08, 2004



Notary Public