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OFFICE OF THE GENERAL COUNSEL  
HAROLD A. MCLEAN  
GENERAL COUNSEL  
(850) 413-6199

# Public Service Commission

October 10, 2003

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

**Re: Docket Nos. 981834-TP and 990321-TP**

Dear Ms. Bayó:

Enclosed are the original and seven copies of Staff's Request for Leave to File Amended Prehearing Statement for filing in the above-referenced dockets.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Adam J. Teitzman  
Attorney  
Competitive Markets and Enforcement Section

AUS \_\_\_\_\_  
CAF \_\_\_\_\_ BK:js  
CMP \_\_\_\_\_ Enclosure  
COM 5 \_\_\_\_\_  
CTR \_\_\_\_\_  
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GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
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DOCUMENT NUMBER - DATE  
981834-20660  
FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

DOCKET NO. 990321-TP

OCTOBER 10, 2003

Request for Leave to File Amended Prehearing Statement

The Staff of Florida Public Service Commission respectfully requests leave to file an amended Prehearing Statement for the following reasons:

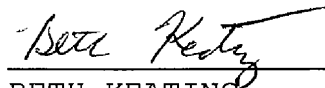
1. Staff filed its original Prehearing Statement in a timely manner on the date set forth in the Order Establishing Procedure for this proceeding, October 6, 2003.
2. Due to an inadvertent oversight by staff counsel, the Prehearing Statement neglected to include positions for the testifying members of staff. Staff notified the parties as soon as the error was discovered.
3. Staff seeks leave to amend its Prehearing Statement to include the positions of testifying staff members so that the record is clear.

COMMISSION STAFF'S REQUEST FOR LEAVE TO FILE AMENDED PREHEARING  
STATEMENT  
DOCKETS NOS. 981834-TP, 990321-TP  
PAGE 2

4. Staff has contacted the parties to the proceeding and there has been no opposition to staff's request to amend. No party will be prejudiced by this request.

Staff, therefore, seeks leave to file its Amended Prehearing Statement, which is filed simultaneously in conjunction with this request.

Respectfully submitted this 10<sup>th</sup> day of October, 2003.



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BETH KEATING  
ADAM TEITZMAN  
JASON ROJAS  
Staff Counsel

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
(850) 413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

DOCKET NO. 990321-TP  
October 10, 2003

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of the forgoing Request for Leave to File Amended Prehearing Statement has been furnished by Electronic Mail and U.S. Mail this 10<sup>th</sup> day of October, 2003, to the following:

Messer Law Firm  
Floyd Self  
P.O. Box 1876  
Tallahassee, FL 32302

John McLaughlin  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043

CERTIFICATE OF SERVICE  
DOCKETS NOS. 981834-TP, 990321-TP  
PAGE 2

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Virginia C. Tate  
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Suite 8100  
Atlanta, GA 30309

Verizon Florida, Inc.  
Richard Chapkis  
c/o David Christian  
106 East College Avenue  
Suite 810  
Tallahassee, FL 32301-7704

FPTA, Inc.  
David Tobin  
Tobin & Reyes  
7251 West Palmetto Park Road  
Suite No. 205  
Boca Raton, FL 33433

CompTel  
Terry Monroe/Genevieve Morelli  
1900 M. Street, NW  
Suite 800  
Washington, DC 20036

Covad Communications Company  
William H. Weber  
1230 Peachtree Street, NE  
19<sup>th</sup> Floor  
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Florida Cable  
Telecommunications Assoc.,  
Inc.  
Michael A. Gross  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303

Florida Competitive Carriers  
Association/Network  
Telephone/BlueStar  
c/o McWhirter Law Firm  
Vicki Gordon Kaufman  
117 S. Gadsden Street  
Tallahassee, FL 32301

Matthew Feil  
Florida Digital Network, Inc.  
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Orlando, FL 32801

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Dunbar, PA  
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Tallahassee, FL 32302

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Huntsville, AL 35802-4343

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CERTIFICATE OF SERVICE  
DOCKETS NOS. 981834-TP, 990321-TP  
PAGE 3

Telecommunications Resellers  
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Sprint-Florida, Incorporated  
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MC: FLTLH00107  
Tallahassee, FL 32316-2214

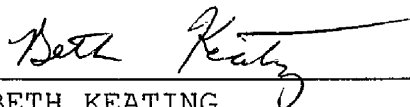
Sprint Communications Co. LLP  
Susan Masterton/C. Rehwinkel  
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MC: FLTLH00107  
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ADAM TEITZMAN  
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