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October 30, 2003

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DISTRIBUTION CENTER

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

Re: Docket 030746-TP
Amended Title: Amended Complaint of Cargill Fertilizer, Inc.
Against Verizon Florida, Inc. For Enforcement
Of FCC Orders and Florida Public Service
Commission Decisions Eliminating The Application
Of Tariff Charges for Complex Inside Wiring, And
Request for Relief
Original Title: Complaint of Cargill Fertilizer, Inc. Against Verizon
Florida, Inc. For Enforcement Of Order
PSC-97-0385-FOF-TL To Eliminate Application And
Associated Charges Of Verizon General Service Tariff
113.2, And Request For Relief

Dear Ms. Bayo:

Enclosed with this transmittal are the following:

- 10825-03 • One (1) original copy of: Motion For Leave To Amend: Complaint of Cargill Fertilizer, Inc. Against Verizon Florida, Inc. for Enforcement of Florida PSC Order No. PSC-97-0385-FOF-TL, and Request for Relief
- 10826-03 • One (1) original copy of: Amended Complaint of Cargill Fertilizer, Inc. Against Verizon Florida, Inc. For Enforcement Of FCC Orders and Florida Public Service Commission Decisions Eliminating The Application Of Tariff Charges for Complex Inside Wiring, And Request for Relief. Please the title change made concurrent with the Motion For Leave To Amend. The original title is Complaint of Cargill Fertilizer, Inc. Against Verizon Florida, Inc. for Enforcement of Florida PSC Order No. PSC-97-0385-FOF-TL and Request for Relief.

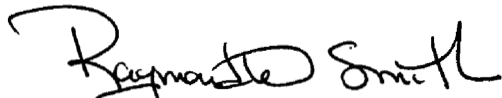
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Ms. Blanca S. Bayo
Docket 030746-TP Document Transmittal
October 30, 2003
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- Fifteen (15) photocopies of each original document identified above, and
- One (1) softcopy of each original document identified above on CD-ROM format prepared using Microsoft Word 2000.

If you have any questions or comments regarding this submission please contact me at my mobile telephone number: 813-245-0302.

Sincerely,


Raymond W. Smith

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Cargill Fertilizer, Inc.)
Against Verizon Florida, Inc. For) Docket No. 030746-TP
Enforcement Of Florida PSC Order No.)
PSC-97-0385-FOF-TL, And Request for) Filed: October 30, 2003
Relief)
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Motion For Leave to Amend:
Complaint of Cargill Fertilizer, Inc.
Against Verizon Florida, Inc.
For Enforcement of Florida PSC Order No. PSC-97-0385-FOF-TL
And Request for Relief

Cargill Crop Nutrition, Inc., f/k/a Cargill Fertilizer (“Cargill”), a subsidiary of Cargill Corporation by and through its undersigned consultants hereby files this MOTION to seek Leave To Amend the above styled complaint to (i) clarify and amend the requested enforcement actions by the Florida Public Service Commission (“FPSC”) and (ii) clarify and amend the amount of tariff refund requested. In support thereof, Cargill states the following:

Following the filing of the Cargill’s original Complaint and Verizon’s Response, Cargill and Verizon personnel have attempted to resolve the issues between them. During these discussions Cargill discovered possible ambiguities in the original complaint with respect to (i) what enforcement action was requested by Cargill and (ii) what amount of tariff refund was requested. Specifically, did the complaint ask the FPSC to enforce Florida PSC Order No. PSC-97-0385-FOF-TL (“ORDER”), an order specific to local exchange carrier Bell South, on Verizon; or did the complaint ask the FPSC to

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FPSC-COMMISSION CLERK

apply the same body of FCC orders and FPSC decisions supporting the ORDER to the Cargill situation?

The amended complaint attached hereto clarifies Cargill's intent to seek a FPSC decision predicated upon the same body of FCC Orders and FPSC decisions that supported the Order; and the amended complaint has been made consistent in its request for a tariff refund to from April 1993 to September 2003. Cargill believes these changes will help all parties to Docket No. 030746-TP during the issues identification process.

Mr. Richard Chapkis, Verizon counsel assigned to the Cargill complaint, has indicated Verizon withholds its position with respect to this Motion until Verizon has reviewed the amended complaint.

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

RESPECTFULLY SUBMITTED this 30th day of October 2003.

Raymond W. Smith
Williams Management Services and Associates
821 South Orleans Blvd.
Tampa, FL 33606

By: 

Raymond W. Smith

Certificate of Service

I hereby certify that a true and correct copy of this Motion For Leave To Amend in

Docket 030746-TP was hand delivered on this 30th day of October 2003 to:

Mr. Richard Chapkis, Esq.
Verizon Florida, Inc.
201 North Franklin Street
Tampa, FL 33602

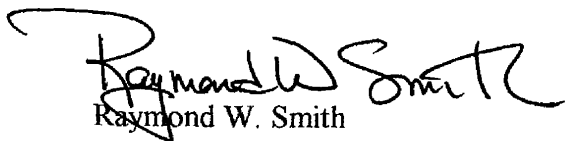
I hereby certify that true and correct copies of this Motion For Leave To Amend in

Docket 030746-TP were sent via U.S. mail on the 30th day of October 2003 to:

Ms. Felicia Banks
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. Greg LeFor, Controller
Cargill Phosphate Production
8813 Highway 41 South
Riverview, FL 33569

Mr. Stephen Murray
IT Infrastructure Manager
Cargill Crop Nutrition
8813 Highway 41 South
Riverview, FL 33569



Raymond W. Smith

Senior Associate
Williams Management Services and Associates
October 30, 2003