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PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
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December 8, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director
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Tallahassee, Florida 32399-0870

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Re: Docket Nos.: 030851-TP and 030852-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Request for Representation by a Qualified Representative, Bill Magness.

Please acknowledge receipt of the above on the extra copy of and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

Vicki Gordon Kaufman

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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, KAUFMAN & ARNOLD, P.A. 12605 DEC -8 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising
From Federal Communications Commission
Triennial UNE review: Local Circuit Switching
For Mass Market Customers

Docket No. 030851-TP

In re: Implementation of requirements arising
From Federal Communications Commission's
Triennial UNE review; Location-Specific
Review for DS1, DS3 and Dark Fiber Loops,
And Route-Specific Review for DS1, DS3 and
Dark Fiber Transport.

Docket No. 030852-TP

Filed: December 8, 2003

**REQUEST FOR REPRESENTATION BY A
QUALIFIED REPRESENTATIVE, BILL MAGNESS**

The Florida Competitive Carriers Association (FCCA), through its undersigned counsel, submits its Request for Representation by a Qualified Representative, Bill Magness, pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. The FCCA is a Florida not-for-profit corporation, whose members provide competitive telecommunications services in the state.
2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request for Representation should be served upon the following individuals:

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Kaufman & Arnold, P.A.
117 South Gadsden
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that the FCCA submit a written request to the presiding officer in the event that the FCCA elects to be represented before the Commission by a qualified representative. The FCCA hereby submits such a request along with the affidavit of FCCA President Brian Sulmonetti. Attachment A.

4. The FCCA seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of the FCCA for any purpose and in all matters or proceedings conducted before the Commission in connection with this docket.

Bill Magness
Casey & Gentz, L.L.P.
919 Congress Avenue, Suite 1060
Austin, Texas 78701
(512) 225-0019 Telephone
(512) 480-9200 Telefax

5. Consistent with Rule 28-106.106(2)(b), the FCCA hereby affirms that it is aware of the services Mr. Magness can provide and, further, that the FCCA can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, the FCCA has elected to be represented in this matter by other attorneys in addition to Mr. Magness.

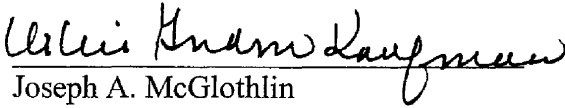
6. The FCCA submits that Mr. Magness possesses the necessary qualifications to responsibly represent the FCCA's interests in this matter. In this regard, Mr. Magness' qualifications are set forth in the attached affidavit, Attachment B.

7. As reflected in Mr. Magness' affidavit, attached as "Attachment B," he: (i) is an attorney admitted to practice in the states of Texas and Massachusetts; (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.

8. Consistent with the standard set forth in Rule 28-106.107, Mr. Magness has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of the FCCA is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, the FCCA requests that Mr. Magness be permitted to appear as a qualified representative on behalf of the FCCA.


Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525
(850) 222-5606 (fax)
jmcglothlin@mac-law.com

Attorneys for Florida Competitive Carriers
Association

Attachment A

Affidavit of Brian Sulmonetti

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising
From Federal Communications Commission
Triennial UNE review: Local Circuit Switching
For Mass Market Customers

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And Route-Specific Review for DS1, DS3 and
Dark Fiber Transport.

Docket No. 030852-TP

AFFIDAVIT OF BRIAN SULMONETTI

STATE OF GEORGIA

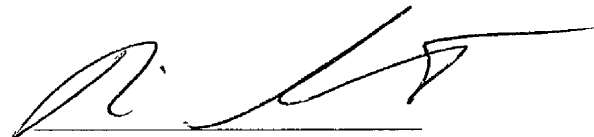
COUNTY OF Fulton

I, Brian Sulmonetti, being first duly sworn, do hereby depose and state as follows:

1. I am the President of the Florida Competitive Carriers Association (FCCA).
2. As the President of the FCCA, I request that the presiding officer allow Bill

Magness to appear as a qualified representative on behalf of the FCCA for any purpose and in all matters or proceedings conducted before the Commission in connection with the above styled dockets.

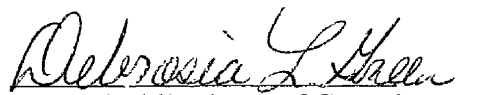
I declare that the foregoing is true and correct based on my knowledge, information and belief.



BRIAN SULMONETTI

SWORN TO AND SUBSCRIBED before me this 24th day of November, 2003, by Brian Sulmonetti, who is personally know to me.

Notary Public, Gwinnett County, G.
My Commission Expires Nov. 12, 2003



Notary Public, State of Georgia
County of Fulton
Commission Number:
My Commission expires: _____

Attachment B

Affidavit of Bill Magness

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising
From Federal Communications Commission
Triennial UNE review: Local Circuit Switching
For Mass Market Customers

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Dark Fiber Transport.

Docket No. 030852-TP

AFFIDAVIT OF BILL MAGNESS

STATE OF TEXAS

COUNTY OF TRAVIS

I, Bill Magness, being first duly sworn, do hereby depose and state as follows:

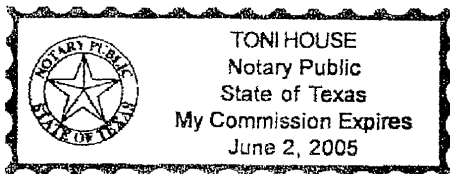
1. I am an attorney with Casey & Gentz, L.L.P.
2. I am a member in good standing of the Texas and Massachusetts Bars and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.
3. I have served as regulatory counsel to numerous companies in proceedings before state commissions. Moreover, I have assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factually and legal issues similar to those under consideration in the above-captioned docket.
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

I declare that the foregoing is true and correct based on my knowledge, information and belief.

Bill Magness
BILL MAGNESS

SWORN TO AND SUBSCRIBED before me this 4th day of December, 2003, by Bill Magness, who is personally know to me.

[Signature]
Notary Public, State of Texas
County of _____
Commission Number: _____
My Commission expires: _____



CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Representation by a Qualified Representative, Bill Magnus has been provided by (*) hand delivery or U.S. Mail this 8th day of December 2003, to the following:

(*) Adam Teitzman, Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Nancy White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

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Verizon Florida, Inc.
201 North Franklin Street
MC: FLTC0717
Tampa, Florida 33602

Susan Masterton
Sprint Communications Company
1313 Blirstone Road
Post Office Box 2214
MC: FLTLHO0107
Tallahassee, Florida 32301

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MCI WorldCom
1203 Governors Square Boulevard
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Southern States, LLC
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Florida Cable Telecommunications
246 East 6th Avenue
Tallahassee, Florida 32302

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390 North Orange Avenue, Suite 2000
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Allegiance Telecom, Inc.
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Washington, DC 20037

Floyd R. Self
Messer, Caparello & Self
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Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, Alabama 35802

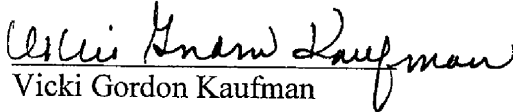
Jake E. Jennings
Senior Vice-President
Regulatory Affairs & Carrier Relations
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NewSouth Center
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Vicki Gordon Kaufman