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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Southeastern Services, Inc. For Arbitration Of An Interconnection Agreement With Northeast Florida Telephone Company, Inc. Pursuant To Section 252(b) Of The Communications Act of 1934, As Amended

Docket No.: 040171-TP Filed: February 26, 2004

MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR ON BEHALF OF SOUTHEASTERN SERVICES, INC.

Pursuant to Rules 28-106.106 and 28-1 06.204, Florida Administrative Code (F.A.C.) Southeastern Services, Inc., respectfully moves the Commission to enter an Order designating W. Scott McCollough, Esquire, as a Qualified Representative authorized to appear in the above-styled matter on behalf of Southeastern Services, Inc.

- 1. As the attached Affidavit reflects (Exhibit "A" hereto), Mr. McCollough is admitted to practice law in Texas.
- 2. As the attached Affidavit reflects (Exhibit "A" hereto), Mr. McCollough has practiced law for over 20 years and is knowledgeable concerning the telecommunications law, the nature of these proceedings, and the applicable law. Due to his extensive experience in the practice of law he is familiar with the rules of evidence. He will comply with the standards of conduct set forth in Rule 28-106.107, F.A.C.
- 3. The law firm of Suzanne Fannon Summerlin, P.A., in conjunction with having Mr. McCollough authorized to appear in the proceeding as a Qualified

DOCUMENT NUMBER-DATE 04444APR-13 FPSC-COMMISSION CLERK Representative, will ensure that Southeastern Services, Inc., is well represented in the above-styled matter.

WHEREFORE, Southeastern Services, Inc. respectfully requests the entry of an Order authorizing Mr. McCollough to appear in this proceeding as Qualified Representative for Southeastern Services, Inc.

Respectfully submitted this 31st day of March, 2004.

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s/ Suzanne F. Summerlin Suzanne F. Summerlin SUZANNE FANNON SUMMERLIN, P.A. 2536 Capital Medical Boulevard Tallahassee, FL 32309 Florida Bar No.: 398586 Telephone: 850-656-2288 Facsimile: 850-656-5589

- CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Qualified Representative to Appear on Behalf of Southeastern Services, Inc., was served by U.S. Mail to the following persons this 31st day of March, 2004.

> s/ Suzanne F. Summerlin Suzanne F. Summerlin, Esq. Counsel for Southeastern Services, Inc.

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