

ORIGINAL

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DIANA K. SHUMANS
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April 22, 2004

VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

COMMISSION
CLERK

APR 22 PM 4:20

RECEIVED 7:50

Re: Docket No. 040028-TP

Dear Ms. Bayó:

Please find enclosed for filing in the above-referenced docket an original and 15 copies of NewSouth Communications Corp.'s Motions for Qualified Representative to Appear on Behalf of NewSouth Communications Corporation. Copies of this letter and the attached document are being distributed this same date to all parties of record via U.S. Mail.

Thank you for your assistance in this matter.

Sincerely,


Diana K. Shumans

AUS DKS/adk
CAF
CMP Enclosure (as stated)
COM
CTR
ECR cc: All Parties of Record
GCL
OPC
MMS
SEC
OTH

(Pryor) 04800-04
(Carroll) 04801-04

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Complaint and Request for Summary Disposition)
BellSouth Telecommunications, Inc. Against)
NewSouth Communications Corp., to Enforce)
Contract Audit Provisions.)

Docket No: 040028-TP

April 22, 2004

**MOTION FOR QUALIFIED REPRESENTATIVE TO
APPEAR ON BEHALF OF NEWSOUTH COMMUNICATIONS CORPORATION**

Pursuant to Rules 28-106.106, 28-106.107 and 28-106.204 of the Florida Administrative Code ("F.A.C.") NewSouth Communications Corp. ("NewSouth"), respectfully moves the Commission to enter an Order designating Michael H. Pryor, Esquire, as a Qualified Representative authorized to appear in the above-styled matter on behalf of NewSouth. The grounds for this motion are as follows:

1. Mr. Pryor is admitted to practice law in the State of California and in the District of Columbia and is in good standing with all the Bars in which he is admitted to practice. His membership in the Bar of the State of California is presently inactive.

2. Mr. Pryor has practiced law for 15 years and is knowledgeable concerning telecommunications law, the nature of these proceedings, and the applicable law. Mr. Pryor is also familiar with the rules of evidence. Mr. Pryor will comply with the standards of conduct set forth in F.A.C. Rule 28-106.107.

3. Mr. Pryor is a partner with Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. and his professional address and telephone number are 701 Pennsylvania Avenue, N.W., Suite 900, Washington, D.C. 20004-2608; (202) 434-7300.

4. NewSouth is aware of the services which Mr. Pryor can and will be performing.

DOCUMENT NUMBER-DATE

04800 APR 22 8

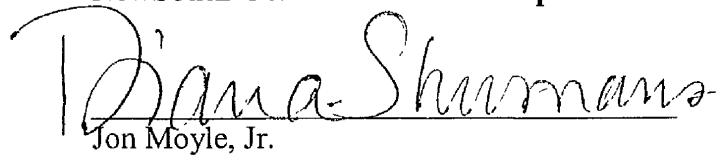
FPSC-COMMISSION CLERK

5. The law firm of Moyle, Flanigan, Katz, Raymond & Sheehan, P.A., in conjunction with having Mr. Pryor authorized to appear in the proceeding as a Qualified Representative, will ensure that New South is well represented in the above-styled matter.

WHEREFORE, NewSouth respectfully requests the entry of an Order authorizing Mr. Pryor to appear in this proceeding as a Qualified Representative for NewSouth Communications Corp.

Respectfully submitted,

NewSouth Communications Corp.

A handwritten signature in cursive script that reads "Diana Shumans". The signature is written in black ink and is positioned above the typed name of the signatory.

Jon Moyle, Jr.

Florida Bar No. 0727016

Diana K. Shumans

Florida Bar No. 0675822

Moyle, Flanigan, Katz, Raymond and
Sheehan, P.A.

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Attorney for NewSouth Communications
Corp.

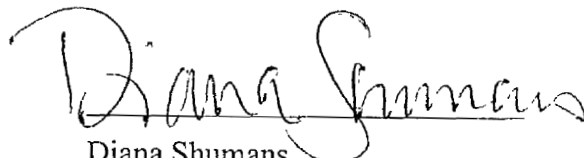
Dated: April 22, 2004

CERTIFICATE OF SERVICE

I, DIANA SHUMANS, hereby certify that a true and correct copy of the foregoing document was sent by U.S. Mail on this 22nd day of April, 2004 to the following:

Lee Fordham, Esquire*
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

R. Douglas Lackey, Esquire
Nancy B. White, Esquire
James Meza, III, Esquire
BellSouth Telecommunications, Inc.
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556


Diana Shumans