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LAW OFFICES  
Messer, Caparello & Self  
A Professional Association

Post Office Box 1876  
Tallahassee, Florida 32302-1876  
Internet: www.lawfla.com

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COMMISSION  
CLERK

March 9, 2005

**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 040156-TP

Dear Ms. Bayó:

Enclosed for filing in the above referenced docket on behalf of MCImetro Access Transmission Services, LLC are an original and fifteen copies of the following documents:

1. Motion to Accept Supplemental Direct Testimony and Exhibit of MCI Witness Greg Darnell; and *02376-05*
2. The Supplemental Direct Testimony and Exhibit of Greg J. Darnell. *02377-05*

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

CMP  
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SEC 1  
OTH Kimp

Thank you for your assistance with this filing.

Sincerely yours,

*Floyd R. Self*  
Floyd R. Self

FRS/amb  
Enclosures  
cc: Parties of Record

RECEIVED & FILED

*Handwritten initials*

PPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02376 MAR-9 05

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In RE: Petition for arbitration of amendment )  
to interconnection agreements with certain ) Docket No. 040156-TP  
competitive local exchange carriers and ) Filed: March 9, 2005  
commercial mobile radio service providers in )  
Florida by Verizon Florida Inc. )  
\_\_\_\_\_ )

**MOTION TO ACCEPT SUPPLEMENTAL DIRECT  
TESTIMONY AND EXHIBIT OF MCI WITNESS GREG DARNELL**

MCImetro Access Transmission Services, LLC, pursuant to Rule 28-106.204, Florida Administrative Code, requests that the Florida Public Service Commission (FPSC) or the prehearing officer enter an order accepting the submission of supplemental direct testimony of MCI witness Greg Darnell and his Exhibit GJD-4, and as grounds thereof, MCI states:

1. On February 25, 2005, MCI prefiled its direct testimony of Mr. Greg Darnell, which addressed Issues 1-16 and 21-26 identified in this proceeding. In his direct testimony, Mr. Darnell stated that MCI reserves the right to file supplemental testimony and to modify its proposed contract language in order to incorporate MCI's position in response to the FCC's Triennial Review Remand Order (TRRO). The TRRO was released on February 4, 2005.

2. Subsequent to the filing of Mr. Darnell's direct testimony, MCI has reviewed more comprehensively the impact of the TRRO and has modified its proposed contract language to reflect the changes in MCI's positions, where applicable. Specifically, MCI has modified its direct testimony and proposed contractual language regarding Issues 3, 4, 5, 9, 11, and 24 as a result of the TRRO.

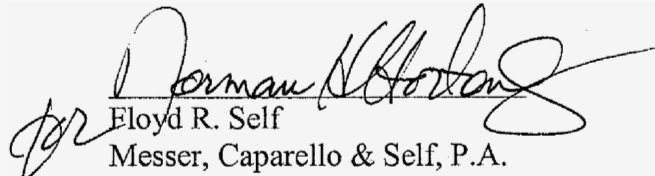
3. MCI believes it is appropriate to provide this information at this time, as soon as MCI completed its analysis of the TRRO and proposed contractual language, in order to provide Verizon and other parties an opportunity to review MCI's supplemental testimony and exhibit in advance of filing the rebuttal testimony, which is scheduled for March 25, 2005. **By filing at this time, Verizon and other parties will have the opportunity to respond in rebuttal testimony, as appropriate, to this supplemental direct testimony and exhibit.** In the event that a party objects to the filing of rebuttal testimony with respect to the specific issues raised by MCI today, MCI would not object to a corresponding delay in the filing of rebuttal regarding these issues. MCI believes that no party would be prejudiced by this filing because all parties will have adequate time to respond to it.

4. On March 9, 2005, undersigned counsel contacted the intervening parties in this proceeding in an attempt to provide them an opportunity to indicate any potential objections to the prefiling of this supplemental direct testimony and exhibit. Counsel for Verizon has advised MCI that they object to this request. While not every other party has responded, those that have responded have indicated that they have no objection with respect to this filing.

5. A copy of Mr. Darnell's supplemental direct testimony and Exhibit GJD-4 is attached hereto, and has been provided electronically to all of the parties today.

WHEREFORE, for the reasons set forth herein, MCI requests that the Florida Public Service Commission or the prehearing officer enter an order allowing the submission of the prefiled supplemental direct testimony of Greg Darnell and his Exhibit GJD-4.

Respectfully submitted this 9<sup>th</sup> day of March, 2005.

  
Eloyd R. Self  
Messer, Caparello & Self, P.A.  
215 S. Monroe Street, Suite 701  
Tallahassee, FL 32302  
(850) 222-0720

Donna Canzano McNulty  
MCI  
1203 Governors Square Blvd, Suite 201  
Tallahassee, FL 32301  
Phone: (850) 219-1008  
Fax: (850) 219-1018

and

Dulaney O'Roark, III  
MCI  
6 Concourse Parkway, Ste. 600  
Atlanta, GA 30328  
Phone: (770) 284-5498  
Fax: (770) 284-5499

Attorneys for MCImetro Access Transmission  
Services, LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail (\*) and/or U.S. Mail on this 9<sup>th</sup> day of March, 2005.

Lee Fordham, Esq.\*  
Office of General Counsel, Room 370  
Florida Public Service Commission  
2540 Shumard Oak-Blvd.  
Tallahassee, FL 32399-0850

Patricia S. Lee\*  
Florida Public Service Commission  
Division of Competitive Markets &  
Enforcement  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Richard A. Chapkis, Esq.  
Verizon Florida Inc.  
P.O. Box 110, FLTC0717  
Tampa, FL 33601-0110

Aaron M. Panner, Esq.  
Scott H. Angstreich, Esq.  
Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C.  
Sumner Square  
1615 M Street, N.W., Suite 400  
Washington, DC 20036

Eagle Telecommunications, Inc.  
5020 Central Avenue  
St. Petersburg, FL 33707-1942

Mr. Michael E. Britt  
LecStar Telecom, Inc.  
4501 Circle 75 Parkway, Suite D-4200  
Atlanta, GA 30339-3025

Donna McNulty, Esq.  
MCI  
1203 Governors Square Boulevard, Suite 201  
Tallahassee, FL 32301-2960

De O'Roark, Esq.  
MCI  
6 Concourse Parkway, Suite 600  
Atlanta, GA 30328

Ms. Martine Cadet  
Myatel Corporation  
P.O. Box 100106  
Ft. Lauderdale, FL 33310-0106

Susan Masterton, Esq.  
Sprint Communications Company Limited  
Partnership  
P.O. Box 2214  
Tallahassee, Florida 32316-2214

W. Scott McCollough  
David Bolduc  
Stumpf, Craddock Law Firm  
1250 Capital of Texas Highway South  
Building One, Suite 420  
Austin, TX 78746

Patrick Wiggins, Esq.  
Wiggins Law Firm  
P.O. Drawer 1657  
Tallahassee, FL 32302

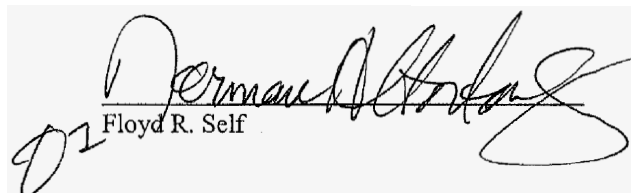
Michael C. Sloan, Esq.  
Swidler Berlin  
3000 K Street, NW, Suite 300  
Washington, DC 20007

Andrew M. Klein, Esq.  
Kelley Drye & Warren, LLP  
1200 Nineteenth Street, NW, Suite 500  
Washington, DC 20036

Matthew Feil, Esq.  
FDN Communications  
2301 Lucien Way, Suite 200  
Maitland, FL 32751

Genevieve Morelli  
Brett H. Freedson  
Kelley Drye & Warren LLP  
1200 19<sup>th</sup> St., NW, Suite 500  
Washington, D.C. 20036

Norman H. Horton, Jr.  
Messer, Caparello & Self, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

  
Floyd R. Self