

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Compliance investigation of Southeastern )  
Services, Inc. for apparent failure to disclose ) Docket No. 050363-TP  
required information on each of its applications )  
for alternative access vendor certificate, )  
competitive local exchange company certificate, ) Filed: September 12, 2005  
and interexchange company certificate. )  
\_\_\_\_\_ )

**NORTHEAST FLORIDA TELEPHONE COMPANY'S  
REQUEST FOR ORAL ARGUMENT**

Northeast Florida Telephone Company ("Northeast Florida") by and through its undersigned counsel, hereby requests the opportunity to present oral argument in support of its Response in Opposition to Southeastern Services, Inc.'s ("SSI") Motion to Dismiss Northeast Florida's Protest of Proposed Agency Action Order and Petition for Formal Administrative Hearing, filed simultaneously herewith.

Oral argument on SSI's Motion to Dismiss will assist the Commission in sorting out the pertinent legal issue raised in the Motion to Dismiss. Although SSI devotes a significant portion of its Motion to Dismiss to its responses to the disputed issues that Northeast Florida has raised in its Protest Petition, the only issue that needs to be addressed by the Commission is SSI's challenge to Northeast Florida's standing to protest PAA Order No. PSC-05-0734-PAA-TP. This proceeding involves numerous amended applications for certificates of public convenience and necessity filed by SSI. Oral argument will assist the Commission in its consideration of Northeast Florida's standing, as a competitor, contracting party under a Resale Agreement, and the carrier of last resort, to participate in this proceeding where the Commission is required to determine whether SSI has the technical, financial and managerial fitness and ability to provide service.

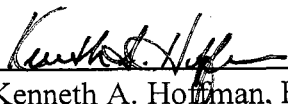
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WHEREFORE, Northeast Florida respectfully requests that oral argument be scheduled on SSI's Motion to Dismiss.

Respectfully submitted,



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Kenneth A. Hoffman, Esq.  
Martin P. McDonnell, Esq.  
Rutledge, Ecenia, Purnell & Hoffman, P.A.  
215 S. Monroe Street, Ste. 420  
P.O. Box 551  
Tallahassee, FL 32301  
850-681-6788 (Telephone)  
860-681-6515 (Telecopier)

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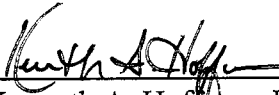
Benjamin H. Dickens, Jr., Esq.  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, Northwest  
Washington, DC 20037  
(202) 828-5510 (Telephone)  
(202) 828-5568 (Telecopier)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by United States Mail this 12<sup>th</sup> day of September, 2005 to:

C. Lee Fordham, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Suzanne Fannon Summerlin, Esq.  
Suzanne Fannon Summerlin, P.A.  
2536 Capital Medical Boulevard  
Tallahassee, FL 32309

  
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Kenneth A. Hoffman, Esq.

NFTCRequest for Oral Argument