

ORIGINAL

Matilda Sanders

From: Steve.Chaiken@STIS.com
Sent: Friday, October 14, 2005 11:30 AM
To: Filings@psc.state.fl.us
Subject: FW: 10-17-05 - Motion for qualified representative Marva Johnson
Attachments: 10-17-05 - Motion for qualified representative Marva Johnson.pdf

From: Chaiken, Steve
Sent: Friday, October 14, 2005 11:22 AM
To: 'fbanks@psc.state.fl.us'; 'JSusac@PSC.STATE.FL.US'; De.oroark@mci.com; fself@lawfla.com; nedwards@itcdeltacom.com; Vicki Gordon Kaufman; Rose Mulvany Henry; mfeil@mail.fdn.com; GWatkins@Covad.com; 'Michael Britt'; Angel Leiro; mgross@fcta.com; donna.mcnulty@mci.com; 'danyelle.kennedy@networktelephone.net'; Nancy.white@bellsouth.com; Nancy.sims@bellsouth.com; 'Edenfield, Kip'
Cc: Johnson, Marva
Subject: 10-17-05 - Motion for qualified representative Marva Johnson

Please see the attached Motion.

Thanks,

Steven B. Chaiken
2901 SW 149th Ave.
Suite 300
Miramar, FL 33027
Tel. 786.455.4239
Fax. 786.455.4600

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10/14/2005

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FPSC-COMMISSION CLEAR



Steven B. Chaiken
2901 SW 149th Avenue
Suite 300
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Phone: 786.455-4239
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October 14, 2005

ORIGINAL

Via Federal Express
Ms. Blanca Bayo, Director
The Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

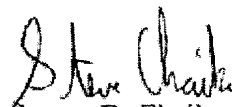
Re: Docket No. 041338-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket, please find the original and fifteen (15) copies of Supra Telecommunications and Information Systems, Inc.'s Motion for Qualified Representative Marva Brown Johnson to Appear on Behalf of Supra Telecommunications and Information Systems, Inc. and Notice of Change of Counsel of Record.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me in the self-addressed-stamped-envelope enclosed herein. Copies have been served to the parties shown on the attached Certificate of Service. If you have any questions, please do not hesitate to contact me.

Sincerely,


Steven B. Chaiken

Cc: All Parties of Record

DOCUMENT NUMBER DATE
09904 OCT 14 05
FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Generic Proceeding to Set)	
Rates, Terms and Conditions for Batch Hot)	Docket No.: 041338-TP
Cuts for UNE-P to UNE-L Conversions and for)	
ILEC to UNE-L Conversions in the BellSouth)	
Telecommunications, Inc. Service Area)	Filed: October 17, 2005
)	

**MOTION FOR QUALIFIED REPRESENTATIVE MARVA BROWN JOHNSON TO
APPEAR ON BEHALF OF SUPRA TELECOMMUNICATIONS AND INFORMATION
SYSTEMS, INC. AND NOTICE OF CHANGE OF COUNSEL OF RECORD**

SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC. ("Supra"), pursuant to Rule 28-106.106, Florida Administrative Code, by and through its undersigned counsel, respectfully requests the Prehearing Officer to enter an Order designating Marva Brown Johnson, Esquire, as a Qualified Representative authorized to appear in the above-styled matter on behalf of Supra. Additionally, Supra requests to change its counsel of record to reflect Marva Brown Johnson, Esquire as its counsel of record. In support of this Motion, Supra states as follows:

1. Supra is a competitive local exchange carrier and provides service in the state of Florida. Supra's primary place of business is located at 2901 SW 149th Ave, Suite 300, Miramar, FL, 33027.

2. This Request is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2) requires that Supra submit a written request to the presiding officer in the event that Supra elects to be represented before the Commission by a qualified representative. Supra hereby submits such a request.

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09904 OCT 14 05
FPSB-COMMISSION CLERK

3 Supra seeks leave of the presiding officer for Marva Brown Johnson, Esq. to appear as a qualified representative on behalf of Supra for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 041338-TP.

4. Consistent with Rule 28-106.106(2)(b), Supra hereby affirms that it is aware of the services Ms. Johnson can provide and, further, that Supra can elect to be represented solely by "counsel," as that term is defined by Rule 106.106(1).

5. Supra submits that Ms. Johnson possesses the necessary qualifications to responsibly represent Supra's interests in this matter. In this regard, Ms. Johnson's qualifications are set forth in the attached affidavit.

6. Ms. Johnson is Supra's General Counsel. Her business address is Supra Telecommunications and Information Systems, Inc., 2901 SW 149th Ave, Miramar, FL 33027. Her work direct dial telephone number is 786-455-4209.

7. As reflected in Ms. Johnson's affidavit, she: (i) is an attorney admitted to practice in the State of Georgia, (ii) is recognized as authorized house counsel by the Florida Bar, (iii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction; (iv) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (v) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence.

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

WHEREFORE, for the foregoing reasons, Supra respectfully requests the entry of an Order authorizing Ms. Johnson to appear in this proceeding as a qualified representative on behalf of Supra and substituting Ms. Johnson as Supra's counsel of record.

RESPECTFULLY SUBMITTED this 17th day of October 2005.

SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.
2901 S.W. 149th Ave.
Miramar, Florida 33027
Telephone: 786.455.4239
Facsimile: 786.455.4600

By: 
Steven B. Chaiken

CERTIFICATE OF SERVICE
Docket No. 041388-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 14th day of October 2005 to the following:

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Jeremy Susac
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mgross@fcta.com

N. White/ D. Lackey/ E. Edenfield
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
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Tallahassee, Florida 32301-1556
Tel. No. (850) 577-5555
Fax No. (850) 222-8640
nancy.white@bellsouth.com
nancy.sims@bellsouth.com

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

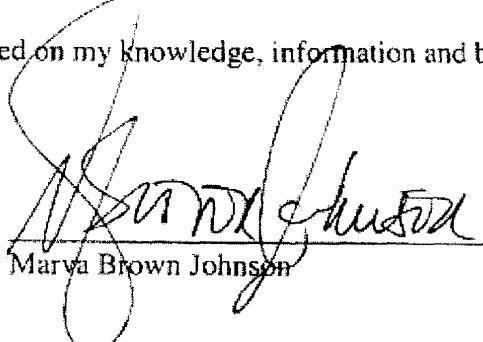
In re: Petition for Generic Proceeding to Set)	
Rates, Terms and Conditions for Batch Hot)	Docket No.: 041338-TP
Cuts for UNE-P to UNE-L Conversions and for)	
ILEC to UNE-L Conversions in the BellSouth)	
Telecommunications, Inc. Service Area)	Filed: October 14, 2005
<hr/>		

AFFIDAVIT OF MARVA BROWN JOHNSON

I, Marva Brown Johnson, do solemnly swear that I am over the age of eighteen, competent to testify and have personal knowledge of the facts set forth herein.

1. I am currently employed as the General Counsel for Supra Telecommunications and Information Systems, Inc. ("Supra"), 2901 SW 149th Ave., Miramar, FL 33027.
2. I am a member of good standing of the State Bar of Georgia, am recognized as authorized house counsel by the Florida Bar, 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 am familiar with the factual and legal issues involved in this 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.

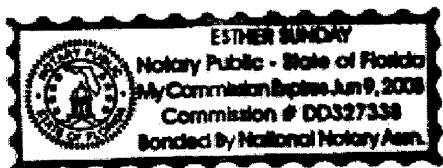
I declare that the foregoing is true and correct based on my knowledge, information and belief.



Marva Brown Johnson

Sworn to and subscribed before me this 14th day of October, 2005 by Marva Brown Johnson who is personally known to me.

My Commission Expires:



Esther Sunday
NOTARY PUBLIC
State of Florida at Large

Print Name: Esther Sunday