



ORIGINAL

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October 18, 2005

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

RECEIVED - FPSC  
05 OCT 19 AM 9:56  
COMMISSION  
CLERK

Re: Docket No. 041269-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

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC 1
- OTH Kim?

Cc: All Parties of Record

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10113 OCT 19 05

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc.

DOCKET NO. 041269-TP

DATED: October 19, 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 149<sup>th</sup> 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.

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. 041269-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 149<sup>th</sup> 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 18<sup>th</sup> day of October 2005.


SUPRA TELECOMMUNICATIONS AND  
INFORMATION SYSTEMS, INC.

2901 S.W. 149<sup>th</sup> Ave.

Miramar, Florida 33027

Telephone: 786.455.4239

Facsimile: 786.455.4600

By:   
Steven B. Chaiken

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing has been served by regular U. S. mail to Adam Teitzman, Kira Scott, Florida Public Service Commission, Division of Legal Services, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, and that a true copy thereof has been furnished to the following by U. S. mail this 18<sup>th</sup> day of October, 2005:

Alan C. Gold, P.A.  
Alan C. Gold  
James L. Parado  
Gables One Tower  
1320 South Dixie Highway, Suite 870  
Coral Gables, FL 33146

FCCA/CompSouth  
Vicki Gordon Kaufman  
c/o Moyle Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301

AT&T  
Sonia Daniels  
1230 Peachtree Street, NE  
4<sup>th</sup> Floor  
Atlanta, GA 30309

AT&T Communications of the Southern States  
Tracy Hatch  
101 North Monroe Street, Suite 700  
Tallahassee, FL 32301

Azul Tel, Inc.  
2200 South Dixie Highway  
Suite 506  
Miami, FL 33133

BellSouth Telecommunications, Inc.  
N. White, D. Lackey, E. Edenfield, M. Mays  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301

Casey Law Firm  
Bill Magness  
98 San Jacinto Blvd., Suite 1400  
Austin, TX 78701

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

GRUCom  
Raymond O. Manasco, Jr.  
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MCI  
Dulaney O'Roark, III  
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Atlanta, GA 30328

Messer Law Firm  
Floyd Self  
P.O. Box 1876  
Tallahassee, FL 32302

Orlando Telephone Company  
4558 S.W. 35<sup>th</sup> Street, Suite 100  
Orlando, FL 32811

SECCA/US LEC Corp.  
Wanda Montano, Terry Romine  
6801 Morrison Blvd.  
Charlotte, NC 28211

STS Telecom  
12233 S.W. 55<sup>th</sup> Street, Suite 811  
Cooper City, FL 33330

Covad Communications Company  
Gene Watkins  
1230 Peachtree Street NE, Suite 1900  
Atlanta, GA 30309

Florida Municipal Power Agency  
Jody Lamar Finklea  
P.O. Box 3029  
Tallahassee, FL 32315

ITC^DeltaCom  
Nanette Edwards  
7037 Old Madison Pike, Suite 400  
Huntsville, AL 35806

MCImetro Access Transmission Services  
Donna C. McNulty  
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Tallahassee, FL 32301

NuVox/NewSouth/Xspedius/KMC Telecom  
J. Heitman, B. Mutschelknaus, S. Kassman  
c/o Kelley Drye Law Firm  
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Washington DC 20036

Rutledge Ecenia Law Firm  
Kenneth Hoffman, Martin McDonnell  
P.O. Box 551  
Tallahassee, FL 32302

Sprint Communications Company  
Susan Masterton  
P.O. Box 2214  
Tallahassee, FL 32316

Supra Telecommunications & Information  
Systems  
Steven Chaiken, Brian Chaiken  
2901 SW 149<sup>th</sup> Avenue, Suite 300  
Miramar, FL 33027

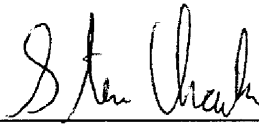
The Helein Law Group  
Jonathan S. Marashlain  
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McLean, VA 22102

WilTel Local Network  
Adam Kupetsky  
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Tulsa, OK 74103

XO Communications, Inc.  
Dana Shaffer  
105 Malloy Street, Suite 300  
Nashville, TN 37201

NuVox/NewSouth/Xspedius/KMC Telecom  
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P.O. Box 1876  
Tallahassee, FL 32302

Steel Hector Law Firm  
Charles A. Guyton  
215 South Monroe Street  
Suite 601  
Tallahassee, FL 32301



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Steve Chaiken  
SUPRA TELECOMMUNICATIONS AND  
INFORMATION SYSTEMS, INC.  
2901 SW 149<sup>th</sup> Ave., Suite 300  
Miramar, Florida 33027

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc.

DOCKET NO. 041269-TP

DATED: October 18, 2005

**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.

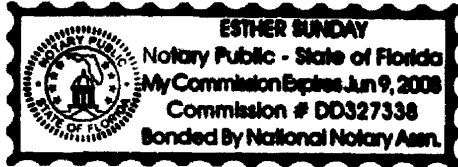
1. I am currently employed as the General Counsel for Supra Telecommunications and Information Systems, Inc. ("Supra"), 2901 SW 149<sup>th</sup> Ave., Miramar, FL 33027.
2. I am a member of good standing of the State Bar of Georgia, am recognized as authorized house counsel by the Florida Bar, and am 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 18<sup>th</sup> 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