

**Ruth Nettles**

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**From:** Slaughter, Brenda [bs3843@att.com]  
**Sent:** Monday, August 06, 2007 4:52 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Holland, Robyn P; Woods, Vickie; Gurdian, Manuel; Byrd, Ike  
**Subject:** Docket 070126-TL  
**Importance:** High  
**Attachments:** 070126-TL Motion for Oral Argument.pdf

**ORIGINAL**

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B. Docket No.: 070126-TL

Petition of AT&T Florida for Relief from Carrier-of-Last Resort Obligations Pursuant to Florida Statutes §364.025(6)(d)  
(Avalon)

C. AT&T Florida  
on behalf of Manuel A. Gurdian

D. 5 pages total (includes letter, pleading and Certificate of Service)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion for Oral Argument

<<070126-TL Motion for Oral Argument.pdf>>

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ORIGINAL

August 6, 2007

Ms. Ann Cole  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 070126-TL: Petition of AT&T Florida for Relief from  
Carrier-of-Last-Resort Obligations Pursuant to Florida Statutes  
§ 364.025(6)(d) (Avalon)**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion for Oral Argument, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian

cc: All parties of record  
Jerry Hendrix  
E. Earl Edenfield, Jr.  
James Meza III

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: )  
 ) Docket No. 070126-TL  
Petition of AT&T Florida for Relief )  
from Carrier-of-Last-Resort Obligations )  
Pursuant to Florida Statutes §364.025(6)(d) )  
(Avalon) )  
\_\_\_\_\_ ) Filed: August 6, 2007

**AT&T FLORIDA’S MOTION FOR ORAL ARGUMENT**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”), pursuant to Rules 28-106.204 and 25-22.0022, Florida Administrative Code, hereby files this Motion for Oral Argument. In support thereof, AT&T Florida states as follows:

1. On August 6, 2007, concurrent with the filing of this Motion for Leave to Present Oral Argument, AT&T Florida filed a Motion for Summary Final Order regarding its Petition for Relief from Its Carrier-of-Last-Resort (“COLR”) Obligations for a development in Hernando County, Florida called Villages of Avalon, Phase II (“Avalon, Phase II”).

2. For the reasons set forth below, AT&T Florida requests that the Florida Public Service Commission (“Commission”) grant it ten (10) minutes to present oral argument in support of AT&T Florida’s Motion and to answer any questions the Commission may have.

3. The instant case presents issues of great importance to AT&T Florida and oral argument would aid the Commission in understanding and evaluating the ultimate issue to be decided - whether AT&T Florida has established that there are no material facts in dispute and that it is entitled to judgment as a matter of law.

4. The relief of a LEC's COLR obligation is a complicated issue which the Commission is approaching and resolving on a case-by-case basis. Oral argument in the instant matter encompassing a discussion by Staff and AT&T Florida will assist the Commission in resolving this complex and important issue.

5. No party will be prejudiced by the granting of this Motion as Avalon Development, LLC withdrew its formal objection to AT&T Florida's Petition on July 11, 2007 and no other party has intervened in this docket.

WHEREFORE, AT&T Florida respectfully requests the Commission to grant its request for oral argument of ten (10) minutes.

Respectfully submitted this 6th day of August, 2007.

AT&T FLORIDA

  
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JAMES MEZA III<sup>1</sup>

TRACY W. HATCH

MANUEL A. GURDIAN

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<sup>1</sup> The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

**CERTIFICATE OF SERVICE**  
**Docket No. 070126-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U. S. Mail this 6th day of August, 2007 to the following:

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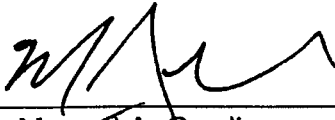
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