

Dorothy Menasco

From: matthew.feil@akerman.com
Sent: Friday, April 30, 2010 4:18 PM
To: Filings@psc.state.fl.us
Cc: Charles Murphy; mg2708@att.com; th9467@att.com; hwalker@babco.com; eheard@lifeconnex.net; nicki.garcia@akerman.com
Subject: RE: Electronic Filing - Docket No. 100021-TP
Attachments: 20100430160241477.pdf

Attached is an electronic filing for the docket referenced below. If you have any questions, please contact either Matt Feil or Nicki Garcia at the numbers below. Thank you.

Person Responsible for Filing:

Matthew Feil
AKERMAN SENTERFITT
 106 East College Avenue, Suite 1200
 Tallahassee, FL 32301
 (850) 425-1614 (direct)
 (850) 222-0103 (main)
 matt.feil@akerman.com

Docket No. and Name: Docket No. 100021 -TP - In Re: Complaint of BellSouth Telecommunications, Inc., d/b/a AT&T Florida Against LifeConnex Telecom, LLC f/k/a Swiftel, LLC

Filed on behalf of: LifeConnex Telecom, LLC

Total Number of Pages: 4 pages (including cover letter)

Description of Documents: LifeConnex LLC's Reply to AT&T Response to Motion to Dismiss or Stay

Office of:
 Lila A. Jaber
 Matthew Feil

Akerman Senterfitt
 106 East College Avenue, Suite 1200
 Tallahassee, FL 32301
 (850) 425-1677
 Nicki.Garcia@Akerman.com



www.akerman.com | Bio | V Card

DOCUMENT NUMBER - DATA
 03591 APR 30 09
 FPSC-COMMISSION CLERK

CONFIDENTIALITY NOTE: The information contained in this transmission may be privileged and confidential information, and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this transmittal, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment.

4/30/2010



Dallas
Denver
Fort Lauderdale
Jacksonville
Los Angeles
Madison
Miami
New York
Orlando
Tallahassee
Tampa
Tysons Corner
Washington, DC
West Palm Beach

Suite 1200
106 East College Avenue
Tallahassee, FL 32301
www.akerman.com
850 224 9634 *rel* 850 222 0103 *fax*

April 30, 2010

VIA ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

**Re: Docket 100021-TP – Complaint of BellSouth Telecommunications, Inc., d/b/a AT&T
Florida Against LifeConnex Telecom, LLC f/k/a Swiftel, LLC**

Dear Ms. Cole:

Attached for filing in the referenced Docket, please find LifeConnex Telecom, LLC's Reply to AT&T's Response to Motion to Dismiss or Stay.

Your assistance in this matter is greatly appreciated. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Matthew Feil
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877
Phone: (850) 224-9634
Fax: (850) 222-0103

(TL224351;1)Attachments

DOCUMENT NUMBER-DATE
03591 APR 30 09
FPSC-COMMISSION CLERK

STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In Re: Complaint of BellSouth Telecomm-)
unications, Inc., d/b/a AT&T Florida)
Against LifeConnex Telecom, LLC f/k/a)
Swiftel, LLC)
_____)

Docket No. 100021-TP

LIFECONNEX TELECOM, LLC's
REPLY TO AT&T'S RESPONSE TO
MOTION TO DISMISS AND/OR STAY

LifeConnex Telecom, LLC f/k/a Swiftel, LLC ("LifeConnex") hereby files the following Reply to the Response ("Response") filed by BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T Florida ("AT&T") on April 9, 2010, to LifeConnex's Motion to Dismiss and/or Stay. LifeConnex maintains that this Reply is permissible and necessary because AT&T's Response makes a request for affirmative relief (in effect, a motion) for security, as addressed in the body of this Reply. To the extent that the Commission deems it necessary for LifeConnex to move for leave to file this Reply¹ under its rules, LifeConnex so moves pursuant to Rule 28-106.204, Florida Administrative Code. In support hereof, LifeConnex states as follows:

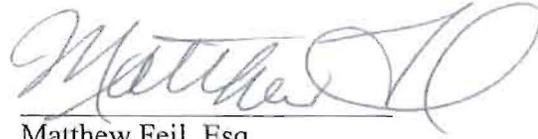
1. LifeConnex hereby adopts and incorporates the arguments made by NewPhone in its Reply to AT&T's Response to Motion to Dismiss or Stay filed on even date herewith in Docket No. 100022-TP.²

¹ This Reply may could have been styled a "Response in Opposition to AT&T's Request for Relief," but for ease in tracking purposes, NewPhone designated it as a "Reply."

² With all references to "NewPhone" changed to "LifeConnex."

Reply to AT&T Response
April 30, 2010

Respectfully submitted this 30th day of April, 2010.

A handwritten signature in black ink, appearing to read "Matthew Feil". The signature is written in a cursive style with a large, looping initial "M".

Matthew Feil, Esq.
Akerman Senterfitt
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 425-1614

Attorneys for LifeConnex Telecom, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or U.S. Mail this 30th day of April, 2010.

Charles Murphy, Esq. Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 cmurphy@psc.state.fl.us	E. Earl Edenfield, Jr. Tracy W. Hatch Manuel A. Guardian c/o Gregory R. Follensbee 150 South Monroe Street Suite 400 Tallahassee, FL 32301 mg2708@att.com th9467@att.com
Henry M. Walker, Esq. Bradley Arant Boult Cummings, LLP 1600 Division Street, Ste 700 Nashville, TN 37203 hwalker@babc.com	

By: 
Matthew Feil, Esq.