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Subject: FL PSC Docket No. 090538-TP - Request for Oral Argument on Joint Motion for Reconsideration of March 2, 2011 Order Denying Motion to Dismiss
Attachments: FL PSC Docket No 090538-TP - Request for Oral Argument on Joint Motion for Reconsideration of March 2, 2011 Order.pdf

Attached for electronic filing in the above-referenced docket, please find the attached Request for Oral Argument on Joint Motion for Reconsideration of March 2, 2011 Order Denying Motion to Dismiss . If you have any questions, please do not hesitate to contact us.

a. Persons responsible for this filing:

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b. Docket No. 090538-TP

c. Filed on behalf of: Access Point, Inc., Lightyear Network Solutions, LLC, Navigator Telecommunications, LLC, PAETEC Communications, Inc., and US LEC of Florida, LLC

d. Total pages: 6

e. Brief Description: Request for Oral Argument on Joint Motion for Reconsideration of March 2, 2011 Order Denying Motion to Dismiss

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3/17/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Amended Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES), XO COMMUNICATIONS SERVICES, INC., TW TELECOM OF FLORIDA, L.P., GRANITE TELECOMMUNICATIONS, LLC, COX FLORIDA TELCOM, L.P., BROADWING COMMUNICATIONS, LLC, ACCESS POINT, INC., BIRCH COMMUNICATIONS, INC., BUDGET PREPAY, INC., BULLSEYE TELECOM, INC., DELTACOM, INC., ERNEST COMMUNICATIONS, INC., FLATEL, INC., LIGHTYEAR NETWORK SOLUTIONS, LLC, NAVIGATOR TELECOMMUNICATIONS, LLC, PAETEC COMMUNICATIONS, INC., STS TELECOM, LLC, US LEC OF FLORIDA, LLC, WINDSTREAM NUVOX, INC., AND JOHN DOES 1 THROUGH 50, For unlawful discrimination.

DOCKET NO. 090538-TP

Filed: March 17, 2010

ACCESS POINT, INC., LIGHTYEAR NETWORK SOLUTIONS, LLC, NAVIGATOR TELECOMMUNICATIONS, LLC, PAETEC COMMUNICATIONS, INC., AND US LEC OF FLORIDA, LLC'S REQUEST FOR ORAL ARGUMENT ON JOINT MOTION FOR RECONSIDERATION OF MARCH 2, 2011 ORDER DENYING MOTION TO DISMISS

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(*) Pursuant to Order No. PSC-10-0691-FOF-OT in Docket No. 100008-OT issued on November 18, 2010, Eric J. Branfman has been designated as a qualified representative for the above-referenced parties in this proceeding.

Dated: March 17, 2011

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FPSC-COMMISSION CLERK

ACCESS POINT, INC., LIGHTYEAR NETWORK SOLUTIONS, LLC, NAVIGATOR TELECOMMUNICATIONS, LLC, PAETEC COMMUNICATIONS, INC., AND US LEC OF FLORIDA, LLC'S REQUEST FOR ORAL ARGUMENT ON JOINT MOTION FOR RECONSIDERATION OF MARCH 2, 2011 ORDER DENYING MOTION TO DISMISS

Pursuant to Rule 25-22.0022, Florida Administrative Code, Access Point, Inc.; Lightyear Network Solutions, LLC; Navigator Telecommunications, LLC; PAETEC Communications, Inc.; and US LEC of Florida, LLC (collectively "Movants"), by and through undersigned counsel, hereby request the Florida Public Service Commission ("Commission") grant oral arguments on the Movants' Joint Motion for Reconsideration filed simultaneously with this request.

The issues raised in the Movants' Joint Motion for Reconsideration are complex and oral arguments will enhance the Commission's understanding of the arguments and analysis. Movants assert that oral arguments will assist the Commission's deliberations and consideration of the issues raised in the Joint Motion for Reconsideration.

For the reasons set forth above, Movants' request the Commission grant the Request for Oral Arguments on the Joint Motion for Reconsideration.

Respectfully submitted,

s/ Eric J. Branfman

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Dated: March 17, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Access Point, Inc., Lightyear Network Solutions, LLC, Navigator Telecommunications, LLC, PaeTec Communications, Inc., and US LEC of Florida, LLC's Request for Oral Argument on Joint Motion for Reconsideration of March 2, 2011 Order Denying Motion to Dismiss has been furnished by email or by U.S. Mail to the following on this 17th day of March 2011.

/s/ Kimberly A. Lacey

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