

Eric Fryson

From: Marsha Rule [Marsha@reuphlaw.com]
Sent: Tuesday, September 18, 2012 2:49 PM
To: Filings@psc.state.fl.us
Subject: Dkt. 120008-OT
Attachments: Shortley.QR Request.pdf

Person Responsible for Filing:

Marsha E. Rule, Attorney
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Docket Name and Number: Docket No. 120008-TP – Applications for qualified representative status

Filed on Behalf of:

Broadwing Communications, LLC

Total Number of Pages: 4

Description of Documents:

Broadwing's Request for Qualified Representative Michael J. Shortley

Marsha E. Rule, Attorney

Rutledge, Ecenia & Purnell, P.A.
119 South Monroe St. Suite 202
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DOCUMENT NUMBER-DATE

06262 SEP 18 2012

FPSC-COMMISSION CLERK

9/18/2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for qualified representative status)
)
)
_____)

Docket No. 120008-OT

Filed: September 18, 2012

**BROADWING COMMUNICATIONS, LLC'S
REQUEST FOR NAMING OF QUALIFIED REPRESENTATIVE
MICHAEL J. SHORTLEY, III**

Pursuant to Rule 28-106.106, Florida Administrative Code, Broadwing Communications LLC ("Broadwing") requests that Michael J. Shortley, III be named its qualified representative in all docketed and non-docketed matters currently before the Commission and in any new matters in calendar year 2012. Broadwing specifically requests that such authorization remain in effect until the conclusion of Docket 090358-TP, including any appeal. Broadwing is aware that it can be represented by counsel as defined in Rule 28-106.106, Florida Administrative Code and has also elected such representation.

Attached hereto is a sworn affidavit setting forth Mr. Shortley's qualifications. Mr. Shortley's address and telephone number are:

Michael J. Shortley, III
Level 3 Communications
222 Kenneth Drive
Rochester, New York, 14623
585.244.1429

WHEREFORE, for the above and foregoing reasons, Broadwing Communications LLC, respectfully requests that the Florida Public Service Commission grant this request.

DOCUMENT NUMBER-DATE

06262 SEP 18 2012

FPSC-COMMISSION CLERK

Respectfully submitted:

/s/ Marsha E. Rule

MARSHA E. RULE
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Broadwing Communications, LLC

CERTIFICATE OF SERVICE
Docket 120008-OT

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Naming of Qualified Representative has been furnished by U.S. Mail to the following parties on this 18th day of September, 2012:

S. Curtis Kiser
General Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

/s/ Marsha E. Rule

Marsha E. Rule

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for qualified representative status)
_____)

Docket No. 120008-OT

AFFIDAVIT OF MICHAEL J. SHORTLEY, III

STATE OF NEW YORK
COUNTY OF MONROE

I, Michael J. Shortley, III, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney and Vice President for Level 3 Communications, LLC, which is a corporate affiliate of Broadwing Communications, LLC.

2. I am a member in good standing of the Bars of the State of New York and the District of Columbia 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 have served as regulatory counsel for the above-named entities in proceedings before state regulatory Commissions, including proceedings involving the examination and resolution of factual and legal issues.

4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, the Florida Rules of Evidence, and Rule 28-106.107, Florida Administrative Code.

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

Michael J. Shortley, III
Michael J. Shortley, III

SWORN TO AND SUBSCRIBED before me this 18th day of September, 2012, by Michael Shortley, who () is personally known to me; or () who has presented proper identification.

Craig L. Charles
Notary Public, State of New York
Commission Number: 8/20/2015
My Commission expires: 01CN 617 3117

