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June 11, 1997

VIA FEDERAL EXPRESS

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: **Telenet of South Florida, Inc.
Emergency Motion for Stay
Docket No. 961346-TP**

Dear Ms. Bayo:

Transmitted herewith is the original Mitchell Kupinsky Affidavit (Exhibit 2) for association with the original version of the Telenet June 10, 1997 Emergency Motion for Stay. Due to time constraints, an executed and notarized facsimile version of this affidavit was filed with the original by Federal Express yesterday. I discussed this procedure with Ms. Linda Williams of your office yesterday by telephone.

Kindly substitute the enclosed original affidavit for the facsimile version transmitted yesterday. Although all of the copies and service copies sent out yesterday contained the facsimile affidavit, I am nevertheless filing the original and 15 copies of this letter, and serving all parties noted on the service list for their information. Thank you for your attention to this matter.

CK _____
FA _____
PP _____
AF _____
ML Green
TP _____
AD _____
E 1
J 2
NDH _____
SEC 1
WAS _____
OTH _____

Enclosures

cc: All parties of record

Sincerely,

Ronald J. Jarvis

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re:)
)
TELENET OF SOUTH FLORIDA, INC.)
)
Petition for Arbitration of Dispute with)
BellSouth Telecommunications, Inc.)
regarding call forwarding)

Docket No. 961346-TP

AFFIDAVIT OF MITCHELL A. KUPINSKY

Mitchell A. Kupinsky, being duly sworn, hereby states as follows:

1. I am the Executive Vice President and CEO of Telenet of South Florida, Inc. ("Telenet"), and I am directly involved in, and knowledgeable concerning, Telenet's operations and customer relationships.

2. Telenet is a certificated alternative local exchange carrier in the State of Florida, providing service to approximately 250 customers in the south Florida area. Telenet's services present an economical competitive alternative to callers for calls within the South Florida LATA that contains Palm Beach, Broward and Dade Counties.

3. The purpose of this Affidavit is to support Telenet's Motion for Stay pursuant to Rule 25-22.061(2) of the Florida Administrative Code, delaying the effectiveness of the Commission's Order in the arbitration proceeding with BellSouth, and thereby preventing BellSouth from terminating service to Telenet as planned on June 13, 1997.

4. Telenet's ability to provide service to its customers depends entirely on the use of call forwarding services purchased from BellSouth. In the event that BellSouth terminates provision of call forwarding services to Telenet on June 13, 1997 as it threatens to do, all of Telenet's operations, and service to every customer will cease immediately.

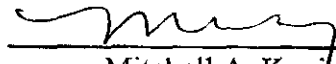
5. If BellSouth terminates call forwarding services to Telenet on June 13, 1997, it will cause irreparable harm to Telenet's operations, and Telenet's credibility as a competitive provider of telecommunications services. Not only will this cause significant monetary losses, but it will also make it virtually impossible for Telenet to regain customers whose services have been interrupted by the termination. Many, if not all of them will revert back to making their calls with BellSouth; it may be impossible to persuade them to return if and when Telenet reaches an interconnection agreement with BellSouth.

6. There is no apparent reason why BellSouth could not continue to provide service to Telenet pending conclusion of an appropriate interconnection agreement between the companies, as contemplated by the Commission in its arbitration order. Since Telenet has determined that it will "opt-in" to the AT&T Interconnection Agreement as offered by BellSouth in April, 1997, there is no need for extensive further interconnection negotiations, and no compelling need for a termination of Telenet service by BellSouth.

7. Although failure to grant the stay would cause irreparable harm to Telenet and its customers, the delay of the Commission's arbitration order represented by the stay would not cause undue harm to BellSouth, nor would it cause any injury to the public. Granting the requested stay would allow Telenet the ability to preserve its operations while entering the new relationship with BellSouth: this would be in the public interest, since it would foster additional intra-LATA competition, and it would avoid undue and unnecessary disruption to Telenet's customers.

Further the affiant saith naught.


Dated: June 10, 1997



Mitchell A. Kupinsky

County of Broward)
) ss:
State of Florida)

On this 10th day of June came before me, a Notary Public in and for the State of Florida, Mitchell A. Kupinsky, well-known to me or having furnished sufficient evidence of his identity, and, being duly sworn, executed the foregoing "Affidavit of Mitchell A. Kupinsky" in my presence.



Notary Public [SEAL]
ALAN J. WYLIE
Notary Public, State of Florida
My Comm. expires Apr 6, 1998
No. CC362173

My Commission Expires: _____

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of June 1997, copies of the foregoing original AFFIDAVIT OF MITCHELL KUPINSKY in the Emergency Motion For Stay of Telenet of South Florida, Inc.; Docket No. 961346-TP, were sent via Federal Express to the following parties:

Ms. Blanca S. Bayo (0 + 15)
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Joe Garcia
Commissioner
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

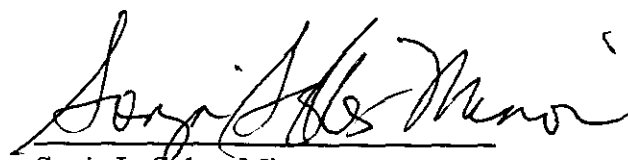
Diane K. Kiesling
Commissioner
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

J. Phillip Carver
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301

Nancy H. Sims
Director, Regulatory Affairs
BellSouth Telecommunications, Inc.
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Nancy White
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675 West Peachtree Street
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Charlie Pellegrini
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Sonja L. Sykes-Minor