

Dorothy Menasco**ORIGINAL**

From: Bobeck, Joshua M. [Josh.Bobek@bingham.com]
Sent: Thursday, August 09, 2007 4:56 PM
To: Filings@psc.state.fl.us
Cc: Kiddoo, Jean L.; dstarcher@broadandcassel.com
Subject: Docket No. 050257-TL - Request of The Greater Orlando Aviation Authority For Representation By Qualified Representatives
Importance: High
Attachments: GOAA Request For Qualified Representative.PDF

A. Joshua M. Bobeck
 Bingham McCutchen, LLP
 2020 K Street, NW
 Washington, DC 20006
 (Tel.) 202-373-6010
 E-mail: josh.bobek@bingham.com

B. Docket No. 050257-TL

Complaint by BellSouth Telecommunications, Inc., Regarding the Operation of a Telecommunications Company by Miami-Dade County in Violation of Florida Statutes and Commission Rules

C. The Greater Orlando Aviation Authority

D. 9 Pages (includes cover letter, Request and certificate of service)

E. GOAA Request For Qualified Representative

Joshua M. Bobeck

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DOCUMENT NUMBER-DATE

07021 AUG-9 5

8/9/2007

FPSC-COMMISSION CLERK

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August 9, 2007

Via Electronic Filing

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

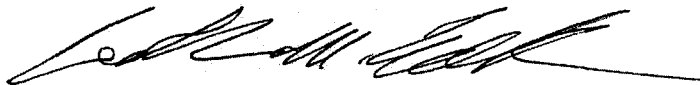
**Re: Docket No. 050257-TL: Complaint by BellSouth Telecommunications, Inc.,
Regarding the Operation of a Telecommunications Company by Miami-Dade
County in Violation of Florida Statutes and Commission Rules**

Dear Ms. Cole:

Enclosed for filing in the above-referenced proceedings is a the Request of the Greater Orlando Aviation Authority for Representation by Qualified Representatives. Copies were served on the parties listed in the attached Certificate of Service.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,



Jean L. Kiddoo
Joshua M. Bobeck

cc: Parties of Record

- Boston
- Hartford
- Hong Kong
- London
- Los Angeles
- New York
- Orange County
- San Francisco
- Santa Monica
- Silicon Valley
- Tokyo
- Walnut Creek
- Washington

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07021 AUG-9 5

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by BellSouth)
Telecommunications, Inc., Regarding)
The Operation of a Telecommunications)
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)

Docket No. 050257

**REQUEST OF THE GREATER ORLANDO AVIATION AUTHORITY
FOR REPRESENTATION BY QUALIFIED REPRESENTATIVES**

The Greater Orlando Aviation Authority (“GOAA”), through undersigned counsel, submits this Request for Representation by Qualified Representatives pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that GOAA submit a written request to the presiding officer in the event that GOAA elects to be represented before the Commission by a qualified representative. GOAA hereby submits such a request.

2. GOAA seeks leave of the presiding officer for the individuals identified below to appear as a qualified representative on behalf of GOAA for any purpose and in all matters or proceedings conducted before the Commission in connection with the above-captioned proceeding:

Jean L. Kiddoo, Esq.
BINGHAM MCCUTCHEN LLP
2020 K Street, N.W.
Washington, DC 20006
Tel: (202) 373-6000
Fax: (202) 373-6001
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Joshua M. Bobeck
BINGHAM MCCUTCHEN LLP
2020 K Street, N.W.
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3. Consistent with Rule 28-106.106(2)(b), GOAA hereby affirms that it is aware of the services that Ms. Kiddoo and Mr. Bobeck can provide and further, that GOAA can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1).

4. The County submits that Ms. Kiddoo and Mr. Bobeck possess the necessary qualifications to responsibly represent GOAA’s interest in this matter. In this regard, Ms. Kiddoo’s and Mr. Bobeck’s qualifications are set forth in the attached affidavits.

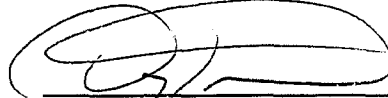
5. As reflected in Ms. Kiddoo’s affidavit, she is: (i) an attorney admitted to practice in the District of Columbia; (ii) has reviewed those portions of the Florida Statutes relative to the Commission’s jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding. In addition, Ms. Kiddoo has represented other public utility clients, in various other proceedings, before this Commission.

6. As reflected in Mr. Bobeck’s affidavit, he is: (i) an attorney admitted to practice in the District of Columbia; (ii) has reviewed those portions of the Florida Statutes relative to the Commission’s jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding.

6. Ms. Kiddoo and Mr. Bobeck will conduct themselves consistent with the standards set forth in Rule 28-106.107, and Ms. Kiddoo and Mr. Bobeck have acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of GOAA is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, GOAA requests that Ms. Kiddoo and Mr. Bobeck be permitted to appear as qualified representatives on behalf of GOAA.

Respectfully submitted this 9th day of August, 2007

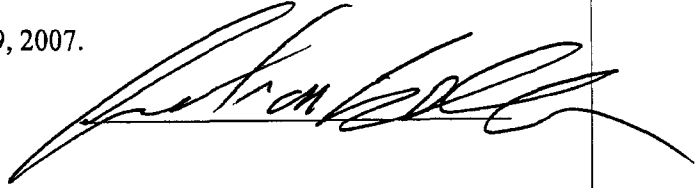


Douglas Starcher, P.A.
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dstarcher@broadandcassel.com

Counsel for the Greater Orlando Aviation Authority

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to the parties on the attached service list on August 9, 2007.



Adam Teitzman, Esq.
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Martin B. Goldberg, Esq.
Lash & Goldberg LLP
Bank of America Tower
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100 Southwest 2nd Street
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James Meza, Esq.
Sharon R. Liebman, Esq.
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
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Tallahassee, FL, 32301

E. Earl Edenfield, Jr., Esq.
BellSouth Telecommunications, Inc.
675 West Peachtree Street, N.E., Suite 4300
Atlanta, GA 30375

R. A. CUEVAS, JR., Acting Miami-Dade County Attorney
David Stephen Hope, Assistant County Attorney
Stephen P. Clark Center
111 Northwest 1st Street, Suite 2800
Miami, FL 33128-1993

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by BellSouth)
Telecommunications, Inc., Regarding)
The Operation of a Telecommunications)
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)

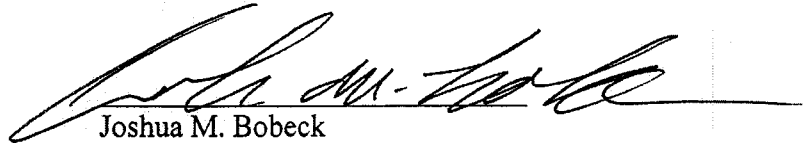
Docket No. 050257

AFFIDAVIT OF JOSHUA M. BOBECK

I, Joshua M. Bobeck, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with Bingham McCutchen LLP.
2. I am a member in good standing of the District of Columbia Bar 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 assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

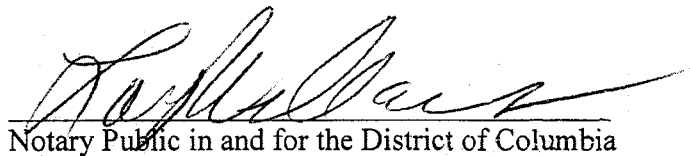
I declare that the foregoing is true and correct based on my knowledge, information, and belief.


Joshua M. Bobeck

The District of Columbia)

BEFORE ME, the undersigned Notary Public, on this day appeared Joshua M. Bobeck, who, being duly sworn on his oath, deposed and said that he has executed the foregoing instrument and that the statements contained therein are true and correct to the best of his knowledge, information and belief.

SUBSCRIBED AND SWORN TO BEFORE ME on this the 9th day of August 2007, to certify which, witness my hand and official seal of office.


Notary Public in and for the District of Columbia

My Commission expires: _____

Lori S. Williams
Notary Public, District of Columbia
My Commission Expires 3-31-2010

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by BellSouth)
Telecommunications, Inc., Regarding)
The Operation of a Telecommunications)
Company by Miami-Dade County in)
Violation of Florida Statutes and)
Commission Rules)

Docket No. 050257

AFFIDAVIT OF JEAN L. KIDDOO

I, Jean L. Kiddoo, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with Bingham McCutchen LLP.
2. I am a member in good standing of the District of Columbia Bar 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 assisted other attorneys in proceedings before other state commissions, including the Florida Public Service Commission, that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

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

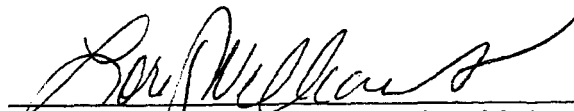


Jean L. Kiddoo

The District of Columbia)

BEFORE ME, the undersigned Notary Public, on this day appeared Jean L. Kiddoo, who, being duly sworn on her oath, deposed and said that she has executed the foregoing instrument and that the statements contained therein are true and correct to the best of her knowledge, information and belief.

SUBSCRIBED AND SWORN TO BEFORE ME on this the 9th day of August 2007, to certify which, witness my hand and official seal of office.



Notary Public in and for the District of Columbia

My Commission expires: _____

Lori S. Williams
Notary Public, District of Columbia
My Commission Expires 3-31-2010