

**Ruth Nettles**

100008-OT

**From:** Allen Zoracki [azoracki@kleinlawpllc.com]  
**Sent:** Friday, February 05, 2010 3:49 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** AKlein@kleinlawpllc.com  
**Subject:** Docket No. 100008-OT - Request for Naming of Qualified Representatives  
**Attachments:** Docket No. 100008-OT - Qualified Rep Request.pdf

Attached for electronic filing in the above-referenced docket, please find the attached Request for Naming of Qualified Representatives. If you have any questions, please do not hesitate to contact us.

a. Persons responsible for filing:

Andrew M. Klein  
Allen C. Zoracki  
KLEIN LAW GROUP <sup>PLLC</sup>  
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b. Docket No.: 100008-OT

c. Filed on behalf of: Granite Telecommunications, LLC

d. Total pages: 7

e. Brief Description: Request for Naming of Qualified Representatives

DOCUMENT NUMBER-DATE

10837 FEB-5 2010

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hereto are the sworn affidavits of Andrew M. Klein and Allen C. Zoracki, setting forth their respective qualifications as required by Rule 28-106.106.

WHEREFORE, for the foregoing reasons, Granite respectfully requests that this Request for Naming of Qualified Representative be granted.

Dated: January 29, 2010

Respectfully submitted,



Neil L. Brodsky  
Corporate Counsel  
Granite Telecommunications, LLC  
100 Newport Avenue Extension  
Quincy, MA 02171  
781-884-5383 (o)  
866-910-9771 (f)  
nbrodsky@granitenet.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of February, 2010 a true and correct copy of the foregoing was electronically filed, and sent via U.S. Mail to the following:

Curt Kiser  
General Counsel  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

*IS Allen C. Zoracki*  
Allen C. Zoracki

**BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA**

In re: Applications for Qualified Representative Status	) ) ) )	Docket No. 100008-OT Filed: February 5, 2010
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**AFFIDAVIT**

ANDREW M. KLEIN, being first duly sworn, states that:

1. I am an attorney with the law firm Klein Law Group PLLC.
2. I represent Granite Telecommunications, LLC in connection with certain legal and regulatory matters relating to telecommunications services.
3. I have prepared this affidavit in connection with Granite's request that I be named a qualified representative of Granite in Docket No. 090538-TP.
4. I possess the necessary qualifications to responsibly represent Granite before the Commission in Docket No. 090538-TP.
5. I am a member in good standing of the bars of the State of New York, State of New Jersey, and the District of Columbia. I am also admitted to practice before the U.S. Supreme Court, U.S. Court of Appeal for the Second Circuit, and several District Courts.
6. I have extensive telecommunications-specific regulatory experience and have appeared in matters before federal and state regulatory commissions, including the Florida PSC. Prior to entering private practice in 2000, I was an Assistant General Counsel and Session Counsel to the New York PSC. I have specifically represented Granite before other state regulatory commissions with respect to analogous issues presented in Docket No. 090538-TP.
7. I am familiar with the portions of the Florida Statutes relating to jurisdiction of the Florida Public Service Commission and the Florida Rules of Civil Procedure relating to

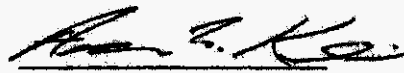
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discovery in an administrative proceeding. I am also familiar with those portions of the Florida Statutes and the Florida Administrative Code relating to rules of evidence in administrative proceedings, including the concept of hearsay in an administrative proceeding.

8. I have obtained or will obtain knowledge of the factual and legal issues involved in Docket No. 090538-TP.

9. I have reviewed Rule 28.106.107, Florida Administrative Code, and agree to abide by its standards.

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

  
Andrew M. Klein

SWORN TO AND SUBSCRIBED before me this 5<sup>th</sup> day of February, 2010.

  
Notary Public

My Commission expires:

NOTARY PUBLIC-STATE OF FLORIDA  
Randy Tulpen  
Commission # DD918351  
Expires AUG. 19, 2013  
BANKERS TRUST ATLANTA FLORIDA CO., INC.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

\_\_\_\_\_  
In re: Applications for Qualified Representative Status )  
Docket No. 100008-OT )  
Filed: February 5, 2010 )  
\_\_\_\_\_

AFFIDAVIT

ALLEN C. ZORACKI, being first duly sworn, states that:

1. I am an attorney with the law firm Klein Law Group PLLC.
2. I represent Granite Telecommunications, LLC in connection with certain legal and regulatory matters relating to telecommunications services.
3. I have prepared this affidavit in connection with Granite's request that I be named a qualified representative of Granite in Docket No. 090538-TP.
4. I possess the necessary qualifications to responsibly represent Granite before the Commission in Docket No. 090538-TP.
5. I am a member in good standing of the bar of the State of New York.
6. I have extensive telecommunications-specific regulatory experience and have appeared in matters before other state regulatory commissions. I have specifically represented Granite before other state regulatory commissions with respect to analogous issues presented in Docket No. 090538-TP.
7. I am familiar with the portions of the Florida Statutes relating to jurisdiction of the Florida Public Service Commission and the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding. I am also familiar with those portions of the Florida Statutes and the Florida Administrative Code relating to rules of evidence in administrative proceedings, including the concept of hearsay in an administrative proceeding.

8. I have obtained or will obtain knowledge of the factual and legal issues involved in Docket No. 090538-TP.

9. I have reviewed Rule 28.106.107, Florida Administrative Code, and agree to abide by its standards.

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

  
Allen C. Zorach

SWORN TO AND SUBSCRIBED before me this 29<sup>th</sup> day of January, 2010.

  
Notary Public

BRUCE A. TRAVIS  
Notary Public, State of New York  
Qualified in Saratoga County  
My Commission Expires 06/24/2010

My Commission expires: 06-24-2010