## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for Qualified Representative Status Docket No. 20240008 Filed: April 16, 2024

# REQUEST TO NAME LANCE STEINHART AS QUALIFIED REPRESENTATIVE

Pursuant to Rules 28-106.106 and 28-106.107, Florida Administrative Code, FLORIDA

TERRACOM INC. d/b/a MAXSIP TEL ("TERRACOM") requests that Lance Steinhart,

Managing Attorney with the law firm Lance J.M. Steinhart, P.C., be named as TERRACOM'S

qualified representative for all docketed and non-docketed matters before the Commission.

1. Mr. Steinhart's business address is as follows:

Lance J.M. Steinhart, Esq. Managing Attorney Lance J.M. Steinhart, P.C. 1725 Windward Concourse, Suite 150 Alpharetta, Georgia 30005 (770) 232-9200 (Phone) (770) 232-9208 (Fax) E-Mail: lsteinhart@telecomcounsel.com

- Consistent with Rule 28-106.106(2)(a), F.A.C., TERRACOM is aware that it can elect to be represented solely by "counsel" as that term is defined by Rule 28-106.106(1) of the Florida Administrative Code.
- TERRACOM submits that Mr. Steinhart possesses the necessary qualifications to responsibly represent TERRACOM in matters before the Commission. Mr. Steinhart's qualifications are set forth in the attached affidavit.
- 4. As reflected in Mr. Steinhart's affidavit, he: (i) is an attorney admitted to practice in the State of Georgia and New York, (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.

5. Consistent with the standard set forth in Rule 28-106.106, F.A.C., Mr. Steinhart has acquired actual knowledge of the factual and legal issues involved insofar as his representation of TERRACOM is concerned in matters before the Commission.

Respectfully submitted,

/s/ David Tatum

David Tatum, CFO FLORIDA TERRACOM INC. d/b/a MAXSIP TEL 6650 E. Brainerd Rd., Suite 200 Chattanooga, TN 37421 david@terracominc.com

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Request for Qualified

Representative Status has been furnished electronically and/or by U.S. Mail to the following on

this 16<sup>th</sup> day of April, 2024.

Keith Hetrick General Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

# /s/ Lance J.M. Steinhart

Lance J.M. Steinhart, Esq. Managing Attorney Lance J.M. Steinhart, P.C. 1725 Windward Concourse, Suite 150 Alpharetta, Georgia 30005 (770) 232-9200 (Phone) (770) 232-9208 (Fax) E-Mail: <u>lsteinhart@telecomcounsel.com</u>

#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for Qualified Representative Status Docket No. 20240008 Filed: April 16, 2024

#### AFFIDAVIT

Lance J.M. Steinhart, being first duly sworn, states that:

- 1. I am an attorney with the law firm Lance J.M. Steinhart, P.C.
- 2. I represent TERRACOM in connection with certain regulatory matters relating to telecommunications services.
- 3. I have prepared this affidavit in connection with TERRACOM's request that I be named a qualified representative of TERRACOM in all docketed and non-docketed matters before the Florida Public Service Commission ("Commission").
- 4. I possess the necessary qualifications to responsibly represent TERRACOM in all docketed and non-docketed matters before the Commission.
- 5. I am a graduate of Georgetown Law School, an attorney admitted to practice, and a member in good standing of the State Bar of Georgia (Bar No. 678222) and the State Bar of New York (Bar No. 2066041).
- 6. I have knowledge of the Florida Statutes relevant to the Commission's jurisdiction; the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; and the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in administrative proceedings. I also have knowledge of the factual and legal issues in the proceedings in which I will represent TERRACOM's interest, including the proceeding in Docket No. 20240063. I further have knowledge of, and am in compliance with, the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.

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

Lance J.M. Steinhart

SWORN TO AND SUBSCRIBED before me this <u>14</u> day of April, 2024 in Forsyth County Georgia.



Kachenel Elizo Selvo Notary Public

My Commission Expires: 12/01/2026