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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Global NAPs, Inc., Against BellSouth Telecommunications, Inc., for Enforcement of Section VI(B) of its Interconnection Agreement with BellSouth Telecommunications, Inc., and Request for Relief.

RECORDS AND REPORTING Docket No. 991267-TP Filed August 31, 1999.

MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR ON BEHALF OF GLOBAL NAPs, INC.

Pursuant to Rules 28-106.106 and 28-106.204, Florida Administrative Code (F.A.C.) Global NAPs, Inc., moves for the entry of an Order designating William J. Rooney, Esq. and Christopher W. Savage, Esq. as qualified representatives authorized to appear in the above-styled matter on behalf of Global NAPs, Inc. The grounds for this motion are as follows:

1. Both Mr. Rooney and Mr. Savage are attorneys admitted to practice law in jurisdictions outside of Florida. Mr. Rooney is admitted to practice law in the states of Massachusetts and New Hampshire. Mr. Savage is admitted to practice law in the District of Columbia and in the State of California.

2. Mr. Rooney is the General Counsel to Global NAPs, Inc., and has practiced telecommunications law for approximately 20 years. He is knowledgeable concerning the nature of the proceedings and applicable law. He will comply with the standards of conduct set forth in Rule 28-106.107, F.A.C.

3. Mr. Savage is a partner in the Washington, D. C. law firm of Coles, Raywid, & Braverman, L.L.P., and has practiced telecommunications law for 14 years. He is knowledgeable concerning the nature of the proceedings and applicable law. He will comply with the standards of conduct set forth in Rule 28-106.107, F.A.C.

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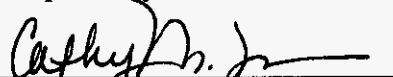
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4. The law firm of Moyle, Flanigan, et al., in conjunction with having Mr. Rooney and Mr. Savage authorized to appear in the proceeding as qualified representatives, will ensure that Global NAPs, Inc. is well represented in the above-styled matter.

WHEREFORE, for the foregoing reasons, the undersigned requests the entry of an Order permitting Mr. Rooney and Mr. Savage to appear in this proceeding as Qualified Representatives for Global NAPs, Inc., and granting such other relief as appropriate.

Respectfully submitted,



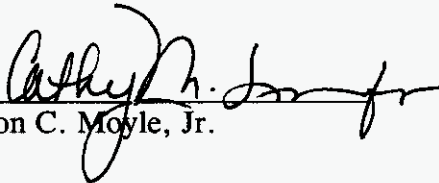
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing MOTION FOR QUALIFIED REPRESENTATIVE TO APPEAR ON BEHALF OF GLOBAL NAPS, INC. was furnished by U.S. Mail, Certified Return Receipt Requested, this 31st day of August, 1999, to Nancy White, Esquire, General Counsel, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, FL 32301.

  
Jon C. Moyle, Jr.