## RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA RICHARD M. ELLIS KENNETH A. HOFFMAN LORENA A. HOLLEY MICHAEL G. MAIDA MARTIN P. McDONNELL J. STEPHEN MENTON

POST OFFICE BOX 551, 32302-0551 215 SOUTH MONROE STREET, SUITE 420 TALLAHASSEE, FLORIDA 32301-1841

> TELEPHONE (850) 681-6788 TELECOPIER (850) 681-6515

> > May 15, 2007

R. DAVID PRESCOTT HAROLD F. X. PURNELL MARSHA E. RULE GARY R. RUTLEDGE MAGGIE M. SCHULTZ

GOVERNMENTAL CONSULTANTS
PARSONS B. HEATH
MARGARET A. MENDUNI

Ms. Ann Cole, Director Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

RE: Docket No. 070008-OT

Dear Ms. Cole:

Attached to this electronic transmission please find the following documents for filing on behalf of Sprint Communications Company Limited Partnership and Sprint Spectrum Limited Partnership d/b/a Sprint PCS, Nextel South Corporation, d/b/a Nextel; NCPR, Inc., d/b/a/ Nextel Partners, and ASC Telecom, Inc. in the above-referenced docket:

Request for Naming of Qualified Representative

Parties of record will be served via U.S. Mail as set forth in the Certificate of Service attached to the Motion. As always, thank you for your assistance with this filing and please do not hesitate to contact me if you have any questions.

Sincerely,

Marsha E. Rule

MER/tc

### **BEFORE THE**

### FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for qualified representative	)	Docket No. 070008-OT
status	)	
	)	Date Filed: May 15, 2007

## REQUEST FOR NAMING OF QUALIFIED REPRESENTATIVE

Pursuant to Rule 28-106.107, Florida Administrative Code, Sprint Communications Company Limited Partnership and Sprint Spectrum Limited Partnership d/b/a/ Sprint PCS, Nextel South Corporation, d/b/a/ Nextel; NCPR, Inc. d/b/a Nextel Partners; and ASC Telecom, Inc., hereinafter collectively referred to as "the Sprint Nextel entities", request that Joseph M. Chiarelli, attorney for the Sprint Nextel entities, be named a qualified representative of the Sprint Nextel entities in all docketed and non-docketed matters currently before the Commission and in any new matters in calendar year 2007 or such additional period as the Commission may authorize. The Sprint Nextel entities are aware that they can be represented by counsel as defined in Rule 28-106.106, Florida Administrative Code and may also elect such representation.

Attached hereto is a sworn affidavit setting forth Mr. Chiarelli's qualifications. Mr. Chiarelli's address is 6450 Sprint Parkway, Mailstop: KSOPHN0214-2A671, Overland Park, KS 66251, and his telephone number is (913) 315-9223.

**WHEREFORE,** for the above and foregoing reasons, Sprint Communications Company Limited Partnership, Sprint Spectrum Limited Partnership d/b/a/ Sprint PCS, Nextel South Corporation, d/b/a/ Nextel, NPCR, Inc. d/b/a Nextel Partners and ASC Telecom, Inc., respectfully request that their Request for Naming of Qualified Representative be granted.

Respectfully submitted

MARSHA E. RULE

Rutledge, Ecenia, Purnell & Hoffman, P.A.

Post Office Box 551

Tallahassee, Florida 32301-0551

(850) 681-6788

(850) 681.6515 facsimile

marsha@reuphlaw.com

ATTORNEYS FOR SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP, NEXTEL SOUTH CORPORTION, NPCR, INC. and ASC TELECOM, INC.

# CERTIFICATE OF SERVICE Docket 070008-OT

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Naming of Qualified Representative has been furnished by U.S. Mail to the following parties on this 15<sup>th</sup> day of May, 2007:

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

Marsha E. Rule

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Naming of	)	Docket No. 070008-OT
Qualified Representative	)	Filed: May 14, 2007

## AFFIDAVIT OF JOSEPH M. CHIARELLI

STATE OF KANSAS COUNTY OF JOHNSON

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

- 1. I am an attorney for the following Sprint Nextel Corporation entities operating in the State of Florida: Sprint Communications Company Limited Partnership.; Sprint Spectrum Limited Partnership d/b/a Sprint PCS; Nextel South Corporation, d/b/a Nextel; NPCR, Inc. d/b/a Nextel Partners; and ASC Telecom, Inc. (collectively, "Sprint").
- 2. I am a member in good standing of the Bar of the states of Kansas and Missouri, 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 am a Senior Counsel in Sprint's Telecom Management Privacy group, where I serve as regulatory counsel for the above-named Sprint entities in matters involving interconnection between Sprint and other telecommunications carriers, including interconnection-related proceedings before state regulatory Commissions.
- 4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, the Florida Rules of Evidence, and Rule 28-106.107, Florida Administrative Code.

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

Joseph M. Chiarelli

SWORN TO AND SUBSCRIBED before me this 14th day of May, 2007, by Joseph M. Chiarelli, who ( ) is personally known to me; or ( ) who has presented proper identification.

Notary Public, State of Kansas

Commission Number: 972216

My Commission expires: 9-12-08