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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

110087-TP

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Notice of adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a NewPhone, Inc. by Express Phone Service, Inc.

Docket No. 110087-TP COMMISSION CLERK

Filed: April 12, 2011

EXPRESS PHONE SERVICE, INC.'S REQUEST FOR ORAL ARGUMENT

Express Phone Service, Inc. (Express Phone), pursuant to Rule 25-22.0022, Florida Administrative Code, hereby requests that the Commission grant oral argument concerning Express Phone's Motion for Summary Final Order filed simultaneously in the above-styled docket. In support thereof, Express Phone states:

1. Express Phone has filed with the Commission today a Motion for Summary Final Order, in which Express Phone asserts that there is no genuine issue as to any material fact regarding Express Phone's October 20, 2010 notice of adoption of the existing interconnection agreement between BellSouth Telecommunications, Inc., d/b/a AT&T Florida (AT&T) and Image Access Inc. d/b/a NewPhone (NewPhone ICA), as amended. It is Express Phone's position, as set out in detail in its Motion for Summary Final Order, that Express Phone is entitled to adopt the NewPhone ICA as a matter of law.

2. Oral argument will aid the Commission in understanding and evaluating the legal bases for Express Phone's Motion for Summary Final Order, including how the standard for summary final order provided in rule 28-106.204(4), Florida Administrative Code, has been met.

Oral argument will help the Commission understand and evaluate AT&T's attempt to avoid the

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application of the relevant law which clearly authorizes Express Phone to adopt the NewPhone ICA.

3. Express Phone requests that each side be granted fifteen (15) minutes for oral argument.

WHEREFORE, Express Phone requests that the Commission grant its Request for Oral Argument.

s/ Vicki Gordon Kaufman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Oral Argument has been furnished by Hand Delivery(*) to the following, this 12th day of April 2011:

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s/ Vicki Gordon Kaufman
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