MCWHIRTER REEVES

ORIGINAL

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

April 10, 2001

VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re:

Docket No.:000121-TP

Dear Ms. Bayo:

On behalf of Covad Communications Company, enclosed for filing and distribution are the original and 15 copies of the following:

► Request for Representation by a Qualified Representative.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

VGK/bae Enclosure

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DOCUMENT NUMBER-DATE

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Street 36. APR 10 =

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies

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Docket No.: 000121-TP Filed: April 10, 2001

REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE

DIECA Communications Company d/b/a Covad Communications Company (Coavd), through its undersigned counsel, submits its Request for Representation by a Qualified Representative pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

- Covad is a certified alternative local exchange carrier and provides service in the state
 of Florida. Coavad is located at 2330 Central Expressway, Santa Clara, California.
- 2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request for Representation should be served upon the following individual:

Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A. 117 South Gadsden Tallahassee, Florida 32301 (850)222-2525 (telephone) (850)222-5606 (fax)

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that Covad submit a written request to the presiding officer in the event that Covad elects to be represented before the Commission by a qualified representative. Covad

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hereby submits such a request.

4. Covad seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of Covad for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 000121-TP.

Catherine F. Boone Covad Communications Company 10 Glenlake Parkway, Suite 650 Atlanta, Georgia 30328 (678) 579-8388 Telephone (678) 320-9433 Facsimile

- 5. Consistent with Rule 25-106.106(2)(b), Covad hereby affirms that it is aware of the services Ms. Boone can provide and, further, that Covad can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, Covad has elected to be represented in this matter by other attorneys in addition to Ms. Boone.
- 6. Covad submits that Ms. Boone possesses the necessary qualifications to responsibly represent Covad's interests in this matter. In this regard, Ms. Boone's qualifications are set forth in the attached affidavit.
- 7. As reflected in Ms. Boone's affidavit, she: (i) is an attorney admitted to practice in the state of Georgia; (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.

8. Consistent with the standard set forth in Rule 28-106.107, Ms. Boone has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as her representation of Covad is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, Covad requests that Ms. Boone be permitted to appear as a qualified representative on behalf of Covad.

Vicki Gordon Kaufman

McWhirter, Reeves, McGlothlin,

Davidson, Decker, Kaufman,

Arnold & Steen, P.A.

117 South Gadsden Street

Tallahassee, Florida 32301

Telephone: (850) 222-2525 Telecopy: (850) 222-5606

Attorneys for Covad Communications Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies

Docket No.: 000121-TP Filed: April 10, 2001

AFFIDAVIT OF CATHERINE F. BOONE

STATE OF GEORGIA	
COUNTY OF FORSYTH	Ì

- I, Catherine F. Boone, being first duly sworn, do hereby depose and state as follows:
- I am regulatory counsel for Covad Communications Company, 10 Glenlake 1. Parkway, Suite 650, Atlanta, Georgia 30328.
- I am a member in good standing of the Georgia State Bar (Bar No. 067710) and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.
- I have served as regulatory counsel to Covad Communications Company in 3. proceedings before state commissions. Moreover, I have assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.
- I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

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

INE F. BOONE

SWORN TO AND SUBSCRIBED before me this day of April Catherine F. Boone who (1) is personally known to me; or () who has presented as identification.



Degard Notary Public, State of Georgia, County of Forsyth

My Commission expires: 12/21/01

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Representation by a Qualified Representative has been furnished by (*) Hand Delivery or U.S. Mail this 10th day of April, 2001:

(*)Tim Vaccaro Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Morton Posner Allegiance Telecom of Florida, Inc. 1150 Connecticut Avenue, NW Suite 205 Washington, DC 20036

Marsha Rule AT&T 101 North Monroe Street, Suite 700 Tallahassee, Florida 32301-1549

Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301-1556

James C. Falvey e.spire Communications, Inc. 133 National Business Parkway Suite 200 Annapolis Junction, MD 20701

Michael A. Gross Florida Cable Telecommunications, Assoc. 246 E. 6th Avenue Tallahassee, Florida 32303

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Kimberly Caswell Verizon Select Services, Inc. Post Office Box 110, FLTC0007 Tampa, Florida 33601-0110

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Vicki Gordon Kaufman