



Kimberly Caswell
Vice President and General Counsel, Southeast
Legal Department

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201 North Franklin Street (33602)
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Tampa, Florida 33601-0110

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January 17, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 011666-TP
Petition by Global NAPS, Inc. for arbitration pursuant to Section 47 U.S.C. 252(b)
of interconnection, rates, terms and conditions with Verizon Florida Inc.

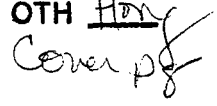
Dear Ms. Bayo:

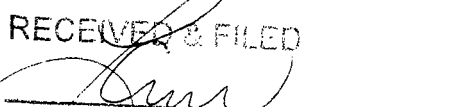
Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Request for
Representation By Qualified Representatives for filing in the above matter. Service has
been made as indicated on the Certificate of Service. If there are any questions
concerning this filing, please contact me at (813) 483-2617.

Sincerely,

 for

- AUS _____ Kimberly Caswell
- CAF _____
- CMP _____
- COM _____ KC:tas
- CTR _____ Enclosures
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH Hong

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Global NAPS, Inc. for arbitration)	Docket No. 011666-TP
pursuant to Section 47 U.S.C. 252(b) of)	Filed: January 17, 2002
interconnection, rates, terms and conditions with)	
Verizon Florida Inc.)	
_____)	

REQUEST FOR REPRESENTATION BY QUALIFIED REPRESENTATIVES

Verizon Florida Inc. (Verizon), through its undersigned counsel, submits its Request for Representation by Qualified Representatives pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. Verizon is a certified incumbent local exchange carrier and provides service in the state of Florida. Verizon is located at 201 N. Franklin Street, FLTC0007, Tampa, Florida 33602.

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 should be served upon the following individuals:

Kimberly Caswell, Esq.
Verizon Florida Inc.
201 N. Franklin Street, FLTC0007
Tampa, Florida 33602
Telephone: 813-483-2617
Fax: 813-204-8870

Kelly L. Faglioni, Esq.
Edward P. Noonan, Esq.
Hunton & Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, VA 23219-4074
Telephone: 804-788-8200
Fax: 804-788-8218

3. This Request is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2) requires that Verizon submit a written request to the

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FPSC-COMMISSION CLERK

presiding officer in the event that Verizon elects to be represented before the Commission by a qualified representative. Verizon hereby submits such a request.

4. Verizon seeks leave of the presiding officer for the individuals identified below to appear as qualified representatives on behalf of Verizon for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 011666-TP:

Kelly L. Faglioni, Esq.
Edward P. Noonan, Esq.
Hunton & Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, VA 23219-4074
Telephone: 804-788-8200
Fax: 804-788-8218

5. Consistent with Rule 28-106.106(2)(b), Verizon hereby affirms that it is aware of the services Ms. Faglioni and Mr. Noonan can provide and, further, that Verizon can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1).

6. Verizon submits that Ms. Faglioni possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Faglioni's qualifications are set forth in the attached affidavit.

7. As reflected in Ms. Faglioni's affidavit, she: (i) is an attorney admitted to practice in the state of Virginia; (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.

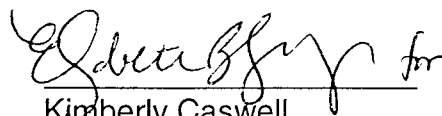
8. Verizon also submits that Mr. Noonan possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Mr. Noonan's qualifications are set forth in the attached affidavit.

9. As reflected in Mr. Noonan's affidavit, he: (i) is an attorney admitted to practice in the state of Virginia; (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.

10. Consistent with the standard set forth in Rule 28-106.107, Ms. Faglioni and Mr. Noonan have acquired or will acquire actual knowledge of the factual and legal issues involved insofar as their representation of Verizon is concerned in the above-referenced proceeding.

WHEREFORE, for the foregoing reasons, Verizon Florida Inc. requests that Ms. Faglioni and Mr. Noonan be permitted to appear as qualified representatives on behalf of Verizon Florida Inc.

Respectfully submitted on January 17, 2002.

By: 
Kimberly Caswell
P. O. Box 110, FLTC0007
Tampa, FL 33601
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Global NAPs, Inc.) Docket No.: 01-16-66
Petition for Arbitration of an)
Interconnection Agreement with) Filed:
Verizon Florida, Inc., F/K/A GTE)
Florida, Inc. Pursuant to Section 252(b))
of the Telecommunications Act of)
1996.)
_____)

AFFIDAVIT OF KELLY L. FAGLIONI

COMMONWEALTH OF VIRGINIA)
CITY OF RICHMOND)

I, Kelly L. Faglioni, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with the law firm of Hunton & Williams, 951 East Byrd Street, Richmond, Virginia, 23219.

2. I am a member in good standing of the Bar of Virginia 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 have served as counsel to Verizon in state and federal proceedings before state commissions and the Federal Communications Commission. Moreover, I have served as counsel and have assisted other attorneys in proceedings before other state commissions and before the Federal Communications Commission that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.

4. 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.

Kelly L. Faglioni
KELLY L. FAGLIONI

COMMONWEALTH/STATE OF VIRGINIA)
CITY/COUNTY OF RICHMOND) ss.

The foregoing instrument was acknowledged before me on this 14th day of January, 2002, by Kelly L. Faglioni.

Andrew B. Rustean
NOTARY PUBLIC

My Commission Expires: 9/30/05

[SEAL]

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of Global NAPs, Inc.) Docket No.: 01-16-66
Petition for Arbitration of an)
Interconnection Agreement with) Filed:
Verizon Florida, Inc., F/K/A GTE)
Florida, Inc. Pursuant to Section 252(b))
of the Telecommunications Act of)
1996.)
_____)

AFFIDAVIT OF EDWARD P. NOONAN

COMMONWEALTH OF VIRGINIA)
CITY OF RICHMOND)

I, Edward P. Noonan, being first duly sworn, do hereby depose and state as follows:

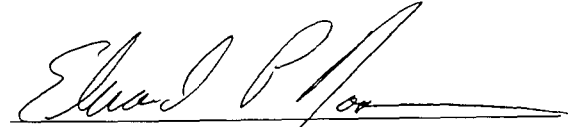
1. I am an attorney with the law firm of Hunton & Williams, 951 East Byrd Street, Richmond, Virginia, 23219.

2. I am a member in good standing of the Bar of Virginia 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 have served as counsel to Verizon in state and federal proceedings before state commissions and the Federal Communications Commission. Moreover, I have served as counsel and have assisted other attorneys in proceedings before other state commissions and before the Federal Communications Commission that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.

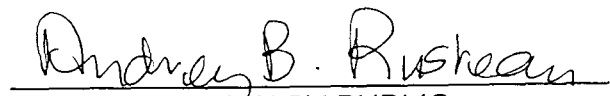
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

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


EDWARD P. NOONAN

COMMONWEALTH/STATE OF VIRGINIA)
CITY/COUNTY OF RICHMOND) ss.

The foregoing instrument was acknowledged before me on this 14th day of January, 2002, by Edward P. Noonan.


NOTARY PUBLIC

My Commission Expires: 9/30/05

[SEAL]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation By Qualified Representatives in Docket No. 011666-TP were sent via U. S. mail on January 17, 2002 to the following:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

John C. Dodge, Esq.
David N. Tobenkin, Esq.
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W., 2nd Floor
Washington, DC 20006

Jon C. Moyle, Esq.
Moyle Flanigan Katz Raymond & Sheehan P.A.
118 North Gadsden Street
Tallahassee, FL 32301

William J. Rooney, Jr.
Vice President and General Counsel
Global NAPS, Inc.
89 Access Road
Norwood, MA 02062


Kimberly Caswell