

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Arbitration of open issues  
resulting from interconnection negotiations with  
Verizon Florida, Inc. by DIECA Communications,  
Inc. d/b/a Covad Communications Company.

---

Docket No.: 020960-TP  
Filed: December 17, 2002

**REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE,  
CHARLES E. WATKINS**

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

1. Covad is a certified telecommunications carrier authorized to provide telecommunications services in the state of Florida. Covad is located at 1230 Peachtree Street, N.E., 19<sup>th</sup> Floor, Atlanta, GA 30309.

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, 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 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. 020960-TP.

Charles E. Watkins  
Covad Communications Co.  
1230 Peachtree Street, N.E., 19<sup>th</sup> Floor  
Atlanta, GA 30309  
(404) 942-3492 (telephone)  
(404) 942-3495 (fax)  
g Watkins@covad.com

5. Consistent with Rule 28-106.106(2)(b), Covad hereby affirms that it is aware of the services Mr. Watkins 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 Mr. Watkins.

6. Covad submits that Mr. Watkins possesses the necessary qualifications to responsibly represent Covad’s interests in this matter. In this regard, Mr. Watkins’ qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Watkins’ affidavit, attached as “Attachment A,” he: (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, Mr. Watkins has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Covad is concerned in the above-referenced proceeding.

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

*Vicki Gordon Kaufman*

---

Vicki Gordon Kaufman  
McWhirter Reeves McGlothlin Davidson  
Decker Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Telephone: (850) 222-2525  
Telecopy: (850) 222-5606

Attorneys for Covad Communications, Inc.

**Docket No. 020960-TP**

**Attachment A**

**Affidavit of Charles E. Watkins**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Arbitration of open issues  
resulting from interconnection negotiations with  
Verizon Florida, Inc. by DIECA Communications,  
Inc. d/b/a Covad Communications Company.

---

Docket No.: 020960-TP  
Filed: 12-17-02

**AFFIDAVIT OF CHARLES E. WATKINS**

STATE OF GEORGIA

COUNTY OF FULTON

I, Charles E. Watkins, being first duly sworn, do hereby depose and state as follows:

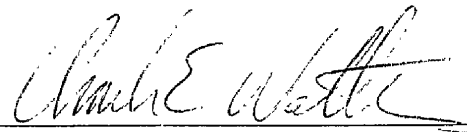
1. I am Senior Counsel for Covad Communications Company, 1230 Peachtree Street, N.E., 19<sup>th</sup> Floor, Atlanta, GA 30309.

2. I am a member in good standing of the Georgia Bar 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 regulatory counsel to Covad Communications Company in 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.

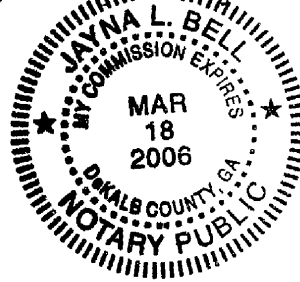
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

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



CHARLES E. WATKINS

SWORN TO AND SUBSCRIBED before me this 27<sup>th</sup> day of November, 2002 by Charles E. Watkins, who is personally known to me.



Jayna L. Bell

Notary Public, State of Georgia; County of Fulton

Commission Number:

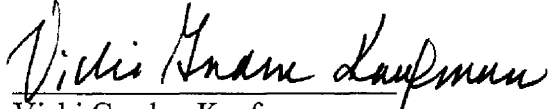
My Commission expires: 3/18/2006

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Representation by a Qualified Representative, Charles E. Watkins has been provided by (\*) hand delivery or U.S. Mail this 17th day of December 2002, to the following:

(\*) Lee Fordham  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Kimberly Caswell  
Vice President and General Counsel  
Verizon Communications  
201 North Franklin Street  
Tampa, Florida 33601-0100

  
Vicki Gordon Kaufman