

ORIGINAL



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March 6, 2003

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

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COMMISSION
CLERK

Re: Docket No. 981834-TP
Petition of Competitive Carriers for Commission Action to Support Local
Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP
Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic
investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida,
Incorporated, and GTE Florida Incorporated comply with obligation to provide
alternative local exchange carriers with flexible, timely, and cost-efficient
physical collocation

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of Verizon Florida Inc.'s Request
for Representation By Qualified Representatives for filing in the above matters.
Service has been made as indicated on the Certificate of Service. If there are any
questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

Richard Chapkis

AUS _____
CAF _____
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COM 5 Enclosures
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission
Action to Support Local Competition in BellSouth
Telecommunications Inc.'s Service Territory

) Docket No. 981834-TP
)
)
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Petition of ACI Corp. d/b/a Accelerated Connections,
Inc. for generic investigation to ensure that BellSouth
Telecommunications, Inc., Sprint-Florida,
Incorporated, and GTE Florida Incorporated comply
with obligation to provide alternative local exchange
carriers with flexible, timely, and cost-efficient
physical collocation

) Docket No. 990321-TP
) Filed: March 6, 2003
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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:

Richard Chapkis, Esq.
Verizon Florida Inc.
201 N. Franklin Street, FLTC0007
Tampa, Florida 33602
Telephone: 813-483-1256
Fax: 813-273-9825

Catherine K. Ronis, Esq.
Daniel McCuaig, Esq.
Jonathan J. Frankel, Esq.
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
Telephone: 202-663-6000
Fax: 202-663-6363

DOCUMENT NUMBER-DATE

02255 MAR -6 8

FPSC-COMMISSION CLERK

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 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 Nos. 981834-TP and 990321-TP:

Catherine K. Ronis, Esq.
Daniel McCuaig, Esq.
Jonathan J. Frankel, Esq.
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
Telephone: 202-663-6000
Fax: 202-663-6363

5. Consistent with Rule 28-106.106(2)(b), Verizon hereby affirms that it is aware of the services Ms. Ronis, Mr. McCuaig and Mr. Frankel 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. Ronis possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Ronis' qualifications are set forth in the attached affidavit.

7. As reflected in Ms. Ronis' affidavit, she: (i) is an attorney admitted to practice in the District of Columbia; (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. McCuaig possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Mr. McCuaig's qualifications are set forth in the attached affidavit.

9. As reflected in Mr. McCuaig's affidavit, he: (i) is an attorney admitted to practice in the State of Maryland and the District of Columbia; (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.

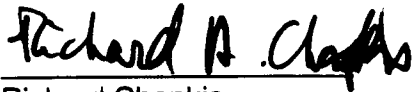
10. Verizon also submits that Mr. Frankel possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Mr. Frankel's qualifications are set forth in the attached affidavit.

11. As reflected in Mr. Frankel's affidavit, he: (i) is an attorney admitted to practice in the State of New Jersey and the District of Columbia; (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.

12. Consistent with the standard set forth in Rule 28-106.107, Ms. Ronis, Mr. McCuaig and Mr. Frankel 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 proceedings.

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

Respectfully submitted on March 6, 2003.

By: 
Richard Chapkis
P. O. Box 110, FLTC0007
Tampa, FL 33601
Telephone: 813-483-1256

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission)	Docket No. 981834-TP
Action to Support Local Competition in BellSouth)	
Telecommunications Inc.'s Service Territory)	
_____)	
Petition of ACI Corp. d/b/a Accelerated Connections,)	Docket No. 990321-TP
Inc. for generic investigation to ensure that BellSouth)	
Telecommunications, Inc., Sprint-Florida,)	
Incorporated, and GTE Florida Incorporated comply)	
with obligation to provide alternative local exchange)	
carriers with flexible, timely, and cost-efficient)	
physical collocation)	
_____)	

AFFIDAVIT OF CATHERINE K. RONIS

I, Catherine K. Ronis, being first duly sworn, do hereby depose and state as follows:

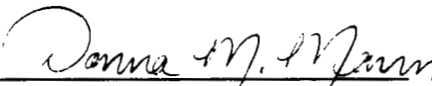
1. I am an attorney with the law firm of Wilmer, Cutler & Pickering, 2445 M Street, N.W., Washington, DC 20037-1420.
2. I am a member in good standing in the District of Columbia and am seeking to be designated as a qualified representative in the above-captioned dockets pursuant to Rule 28-106.106, 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 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 dockets.

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.


CATHERINE K. RONIS

The foregoing instrument was acknowledged before me this 25th day of February, 2003, by Catherine K. Ronis.


NOTARY PUBLIC

My Commission Expires: June 14, 2005

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission)	Docket No. 981834-TP
Action to Support Local Competition in BellSouth)	
Telecommunications Inc.'s Service Territory)	
_____)	
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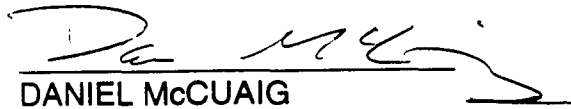
AFFIDAVIT OF DANIEL MCCUAIG

I, Daniel McCuaig, being first duly sworn, do hereby depose and state as follows:

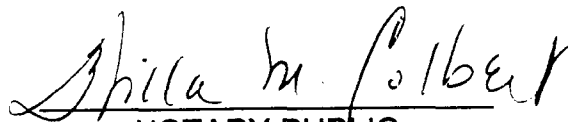
1. I am an attorney with the law firm of Wilmer, Cutler & Pickering, 2445 M Street, N.W., Washington, DC 20037-1420.
2. I am a member in good standing in the State of Maryland and the District of Columbia and am seeking to be designated as a qualified representative in the above-captioned dockets pursuant 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 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 dockets.

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.


DANIEL McCUAIG

The foregoing instrument was acknowledged before me this 5th day of February, 2003, by Daniel McCuaig.


NOTARY PUBLIC

My Commission Expires: Feb. 14, 2004

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission)	Docket No. 981834-TP
Action to Support Local Competition in BellSouth)	
Telecommunications Inc.'s Service Territory)	
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physical collocation)	
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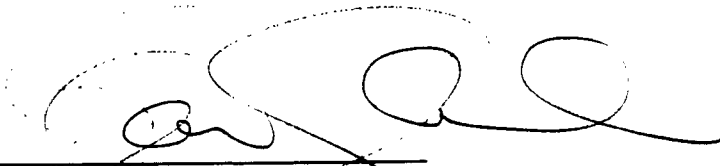
AFFIDAVIT OF JONATHAN J. FRANKEL

I, Jonathan J. Frankel, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with the law firm of Wilmer, Cutler & Pickering, 2445 M Street, N.W., Washington, DC 20037-1420.
2. I am a member in good standing in the State of New Jersey and the District of Columbia and am seeking to be designated as a qualified representative in the above-captioned dockets pursuant to Rule 28-106.106, Florida Administrative Code.
3. I have served as counsel to Verizon in state proceedings before state commissions. Moreover, I have served as counsel and have assisted other attorneys 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 dockets.

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.



JONATHAN J. FRANKEL

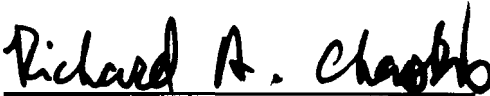
The foregoing instrument was acknowledged before me this 28th day of February, 2003, by Jonathan J. Frankel.

Donna M. Mann
NOTARY PUBLIC

My Commission Expires: June 14, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation By Qualified Representatives in Docket Nos. 981834-TP and 990321-TP were sent via U. S. mail on March 6, 2003 to the parties on the attached list.


Richard A. Chapkis
Richard Chapkis

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