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

September 25, 2003

**VIA HAND DELIVERY**

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

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COMMISSION  
CLERK

Re: Docket No.: 030851-TP and 030852-TP

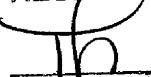
Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

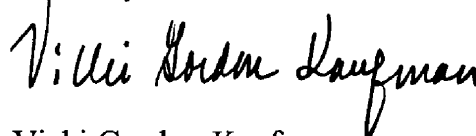
- 09224-03 ▶ Request for Representation by a Qualified Representative, Charles E. Watkins in Docket No. 030851-TP; and
- 09225-03 ▶ Request for Representation by a Qualified Representative, Charles E. Watkins in Docket No. 030852-TP.

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

RECEIVED & FILED

  
\_\_\_\_\_  
FPSC-BUREAU OF RECORDS

Sincerely,



Vicki Gordon Kaufman

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_ VGK/bae
- GCL \_\_\_\_\_ Enclosure
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC 1
- OTH mg to

*Hong*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission  
Triennial UNE review: Local Circuit Switching  
For Mass Market Customers

Docket No. 030851-TP

Filed: September 25, 2003

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**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, Georgia 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  
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.

DOCUMENT NUMBER - DATE

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FPSC-COMMISSION CLERK

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 this docket.

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)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

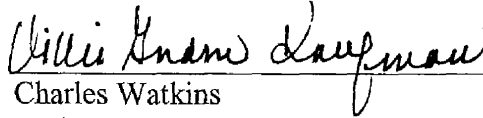
5. Consistent with Rule 28-106.106(2)(b), Covad hereby affirms that it is aware of the services Mr. Watkins can provide and, further, that Covad can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1). Indeed, Covad has elected to be represented in this matter by 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.



Charles Watkins  
Senior Counsel  
Covad Communications Co.  
1230 Peachtree Street, N.E., 19<sup>th</sup> Floor  
Atlanta, Georgia 30309  
(404) 942-3494  
(404) 942-3495 (fax)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

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Tallahassee, Florida 32301  
(850) 222-2525  
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[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Attorneys for DIECA Communications, Inc.  
d/b/a Covad Communications, Company

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**Attachment A**

Affidavit of Charles E. Watkins

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission  
Triennial UNE review: Local Circuit Switching  
For Mass Market Customers

Docket No. 030851-TP

Filed: September 25, 2003

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**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, Georgia 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.

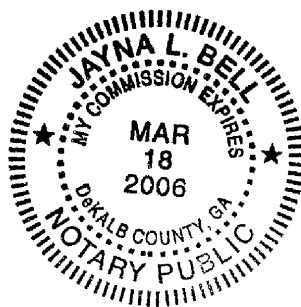
3. I have served as regulatory counsel to Covad Communications Company in proceedings before state commissions. Moreover, I have assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factually and legal issues similar to those under 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 24<sup>th</sup> day of September, 2003, by Charles E. Watkins, who is personally know to me.



Jayna A. Bell  
Notary Public, State of Georgia  
County of Fulton  
Commission Number:  
My Commission expires: 3/18/06

**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 25th day of September 2003, to the following:

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

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

Richard Chapkis  
Verizon Florida, Inc.  
201 North Franklin Street  
MC: FLTC0717  
Tampa, Florida 33602

Susan Masterton  
Sprint Communications Company  
1313 Blairstone Road  
Post Office Box 2214  
MC: FLTLHO0107  
Tallahassee, Florida 32301

Donna Canzano McNulty  
MCI WorldCom  
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Southern States, LLC  
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246 East 6<sup>th</sup> Avenue  
Tallahassee, Florida 32302

Matthew Feil  
Florida Digital Network, Inc.  
390 North Orange Avenue, Suite 2000  
Orlando, Florida 32801

  
Vicki Gordon Kaufman