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Charles E. Watkins
Senior Counsel, External Affairs

October 8, 2003

VIA HAND DELIVERY

Commissioner Charles Davidson
Florida Public Service Commission
Gerald Gunther Bldg, 3rd Floor
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850

Re: Docket Nos.: 030851-TP and 030852-TP

Dear Commissioner Davidson:

During the October 6, 2003 issue identification meeting in the above dockets, you asked whether Covad had a position on Verizon's Florida Inc.'s Response to Orders Establishing Procedure, particularly its suggestion for a separate "trigger" proceeding. In response, I indicated that I considered the preliminary consideration of triggers to be appropriate, but also said that I had not yet had the opportunity to review Verizon's motion and the other parties' responses.

Having now reviewed the parties' submissions, as well as the Joint Proposal from Florida Competitive Carriers Association and BellSouth, I am writing to express Covad's support for the position stated in the FCCA's Opposition to Verizon Florida's Request for an Expedited "Trigger" Proceeding.

Covad supports the Joint Proposal negotiated between the FCCA and BellSouth because it provides for a full development of the factual record within a workable procedural schedule. As I mentioned during my comments at the meeting, the standards provided by the FCC (TRO ¶¶495-500) require discovery - including the determination of the appropriate market and what facilities to consider as "triggers." Without sufficient discovery and time, the accelerated schedule proposed by Verizon will likely prejudice the competitive carriers' ability to "rebut" the testimony submitted by the incumbent carriers. Given the importance of the issues in these dockets, procedurally expediting

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any portion of this case is a mistake. Accordingly, Covad supports the Joint Proposal submitted by the FCCA and BellSouth.

We apologize for any confusion this may have caused.

Sincerely,

Charles E. Watkins/ncgk

Charles E. Watkins

cc: Ms. Blanca Bayo
Beth Keating
All parties of record