

Shawna Senko

From: Scobie, Teresa A (TERRY) <terry.scobie@verizon.com>
Sent: Tuesday, January 21, 2014 1:29 PM
To: Filings@psc.state.fl.us
Cc: Edmonston, Rebecca A (BECKI); Carolyn Ridley; David Konuch; Garry Sharp; Kathryn Cowdery; Ken Plante; Matthew Feil; O'Roark, Dulaney L; Pamela H. Page; Suzanne Montgomery
Subject: Docket No. 120208-TX - Comments of Verizon Florida LLC
Attachments: 120208 VZ FL Post-Workshop Comments 1-21-14.pdf

The attached is submitted for filing on behalf of Verizon Florida LLC by

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The document consists of a total of 5 pages - cover letter (1 page), Comments (2 pages), and Certificate of Service (2 pages).

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January 21, 2014 – **VIA ELECTRONIC MAIL**

Carlotta S. Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 120208-TX
Petition to initiate rulemaking to revise and amend Rule 25-22.0365, F.A.C., by
Competitive Carriers of the South, Inc.

Dear Ms. Stauffer:

Enclosed are Verizon Florida LLC's Comments for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please call me at 678-339-5081.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to initiate rulemaking to revise)	Docket No. 120208-TX
and amend Rule 25-22.0365, F.A.C., by)	Filed: January 21, 2014
Competitive Carriers of the South, Inc.)	
_____)	

COMMENTS OF VERIZON FLORIDA LLC

Verizon Florida LLC (Verizon) files these comments on Staff’s draft revisions to Rule 25-22.0365, Expedited Dispute Resolution Process for Telecommunications Companies, which were distributed to the parties on January 6, 2014. The proposed revisions strike the right balance by adopting changes on which workshop participants reached consensus and excluding revisions that would have created an unworkable alternative expedited dispute resolution process. Verizon’s only proposed modifications, discussed below, concern minor changes to the timeline provided in the rule.

Under the proposed revisions, the respondent would be permitted to respond to a request for expedited proceeding within seven days, but the prehearing officer could not rule on the request any sooner than 14 days. Once the response has been filed, there is no reason the prehearing officer should be required to wait before ruling. Accordingly, the time for a ruling in section (8) should be changed to “[n]o sooner than 7 days after the filing of the request for expedited proceeding.” In addition, the times for filing and responding to motions to dismiss should not be changed, but should be 14 and 21 days, respectively, and the deadline for filing petitions to intervene and related documents should remain 21 days. Otherwise, the risk increases that parties will make such filings on an emergency basis before the prehearing officer has ruled on the request for expedited proceeding.

For these reasons, Verizon requests that its proposed revisions be incorporated into the proposed rule.

Respectfully submitted on January 21, 2014.

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Attorney for Verizon Florida LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent via electronic mail
on January 21, 2014 to:

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s/ Dulaney L. O'Roark III