

**McWHIRTER REEVES**  
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PLEASE REPLY TO:  
  
TALLAHASSEE

TALLAHASSEE OFFICE:  
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TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

April 10, 2001

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APR 10 PM 3:51  
RECORDS AND REPORTING

**VIA HAND DELIVERY**

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

Re: Docket No.: 001797-TP

Dear Ms. Bayo:

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

- ▶ Request for Representation by a Qualified Representative.

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

Sincerely,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

VGK/bae  
Enclosure

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG 2
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC 1
- SER \_\_\_\_\_

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McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEIN

DOCUMENT NUMBER-DATE

0443 | APR 10 01

FPSC-RECORDS/REPORTING

*Done 4/11/01*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for Interconnection Arbitration  
By DIECA Communications, Inc. d/b/a  
Covad Communications Company Against  
BellSouth Telecommunications, Inc.

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Docket No. 001797-TP

Filed: April 10, 2001

**REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE**

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

1. Covad is a certified alternative local exchange carrier and provides service in the state of Florida. Coavad is located at 2330 Central Expressway, Santa Clara, California.
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 & Steen, 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. 000121-TP.

Catherine F. Boone  
Covad Communications Company  
10 Glenlake Parkway, Suite 650  
Atlanta, Georgia 30328  
(678) 579-8388 Telephone  
(678) 320-9433 Facsimile

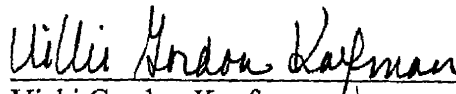
5. Consistent with Rule 25-106.106(2)(b), Covad hereby affirms that it is aware of the services Ms. Boone can provide and, further, that Covad can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, Covad has elected to be represented in this matter by other attorneys in addition to Ms. Boone.

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

7. As reflected in Ms. Boone's affidavit, she: (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, Ms. Boone has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as her representation of Covad is concerned in the above-referenced proceeding.

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



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

Attorneys for Covad Communications Company

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for Interconnection Arbitration  
By DIECA Communications, Inc. d/b/a  
Covad Communications Company Against  
BellSouth Telecommunications, Inc.

Docket No.: 001797-TP  
Filed: April 10, 2001

**AFFIDAVIT OF CATHERINE F. BOONE**

STATE OF GEORGIA )  
COUNTY OF FORSYTH )

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

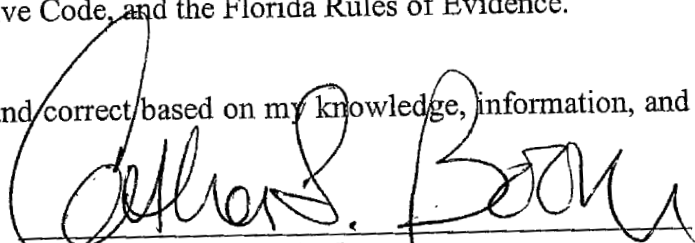
1. I am regulatory counsel for Covad Communications Company, 10 Glenlake Parkway, Suite 650, Atlanta, Georgia 30328.

2. I am a member in good standing of the Georgia State Bar (Bar No. 067710) 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.

  
CATHERINE F. BOONE

SWORN TO AND SUBSCRIBED before me this 9<sup>th</sup> day of Apr. 1, 2001 by Catherine F. Boone who () is personally known to me; or () who has presented \_\_\_\_\_ as identification.



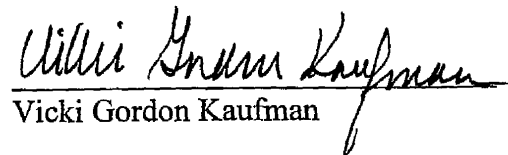
  
Notary Public, State of Georgia, County of Forsyth  
My Commission expires: 12/21/01

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Representation by a Qualified Representative has been furnished by (\*) hand delivery this 10th day of April, 2001, to the following:

(\*)Felicia Banks  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Michael Twomey  
c/o Nancy Sims  
150 S. Monroe Street  
Suite 400  
Tallahassee, Florida 32301

  
Vicki Gordon Kaufman