

Kimberly Caswell
Vice President and General Counsel, Southeast
Legal Department

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FLORIDA PUBLIC
SERVICE COMMISSION

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MAIL ROOM



FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-2606
Fax 813 204-8870
kimberly.caswell@verizon.com

June 27, 2001

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 010795-TP
Petition of Sprint Communications Company Limited Partnership for Arbitration
with Verizon Florida Inc. f/k/a GTE Florida Incorporated, Pursuant to Section
252(b) of the Telecommunications Act of 1996

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s
Request for Representation By Qualified Representatives in the above matter.
Service has been made as indicated on the Certificate of Service. If there are any
questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

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Enclosures

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07968 JUN 27 01

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Sprint Communications) Docket No. 010795-TP
Company Limited Partnership for) Filed: June 27, 2001
Arbitration with Verizon Florida Inc. f/k/a)
GTE Florida Incorporated, Pursuant to)
Section 252(b) of the Telecommunications)
Act of 1996)
_____)

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:

Kimberly Caswell, Esq.
Verizon Florida Inc.
201 N. Franklin Street, FLTC0007
Tampa, Florida 33602
Telephone: 813-483-2617
Fax: 813-204-8870

Kelly L. Faglioni, Esq.
Meredith B. Miles, Esq.
Hunton & Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, VA 23219-4074
Telephone: 804-788-8200
Fax: 804-788-8218

DOCUMENT NUMBER-DATE

07968 JUN 27 01

FPSC-RECORDS/REPORTING

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 No. 010795-TP:

Kelly L. Faglioni, Esq.
Meredith B. Miles, Esq.
Hunton & Williams
Riverfront Plaza, East Tower
951 E. Byrd Street
Richmond, VA 23219-4074
Telephone: 804-788-8200
Fax: 804-788-8218

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

7. As reflected in Ms. Faglioni’s affidavit, she: (i) is an attorney admitted to practice in the state of Virginia; (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 Ms. Miles possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Miles' qualifications are set forth in the attached affidavit.

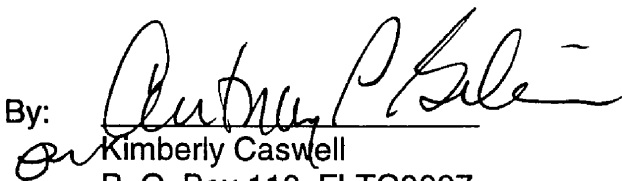
9. As reflected in Ms. Miles' affidavit, she: (i) is an attorney admitted to practice in the states of Virginia and North Carolina; (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction; (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery 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. Consistent with the standard set forth in Rule 28-106.107, Ms. Faglioni and Ms. Miles 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 proceeding.

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

Respectfully submitted on June 27, 2001.

By:



Kimberly Caswell
P. O. Box 110, FLTC0007
Tampa, FL 33601
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Sprint Communications) Docket No.: 010795-TP
Company Limited Partnership for)
Arbitration with Verizon Florida, Inc. f/k/a) Filed:
GTE Florida, Incorporated, Pursuant to)
Section 252(b) of the Telecommunications)
Act of 1996.)
_____)

AFFIDAVIT OF KELLY L. FAGLIONI

STATE OF VIRGINIA)
CITY OF RICHMOND)

I, Kelly L. Faglioni, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with the law firm of Hunton & Williams, 951 East Byrd Street, Richmond, Virginia, 23219.

2. I am a member in good standing of the Bar of Virginia 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 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 in proceedings 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 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.

Kelly L. Faglioni
KELLY L. FAGLIONI

COMMONWEALTH/STATE OF Virginia)
CITY/COUNTY OF Richmond)ss.

The foregoing instrument was acknowledged before me on this 20th day of June, 2001,
by Kelly L. Faglioni.

Belinda A. Wright
NOTARY PUBLIC

My Commission Expires: July 31, 2001

[SEAL]

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Sprint Communications) Docket No.: 010795-TP
Company Limited Partnership for)
Arbitration with Verizon Florida, Inc. f/k/a) Filed:
GTE Florida, Incorporated, Pursuant to)
Section 252(b) of the Telecommunications)
Act of 1996.)
_____)

AFFIDAVIT OF MEREDITH B. MILES

STATE OF VIRGINIA)
CITY OF RICHMOND)

I, Meredith B. Miles, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with the law firm of Hunton & Williams, 951 East Byrd Street, Richmond, Virginia, 23219.

2. I am a member in good standing of the Bars of North Carolina and Virginia 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, with other attorneys at Hunton & Williams, as counsel to Verizon in state 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.


MEREDITH B. MILES

COMMONWEALTH/STATE OF Virginia)
CITY/COUNTY OF Richmond)ss.

The foregoing instrument was acknowledged before me on this 20th day of June, 2001,
by Meredith B. Miles


NOTARY PUBLIC

My Commission Expires: July 31, 2001

[SEAL]

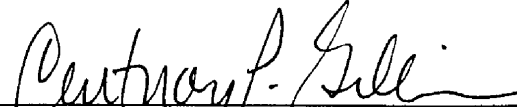
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation By Qualified Representatives in Docket No. 010795-TP were sent via U.S. mail on June 27, 2001 to:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Susan S. Masterton
Charles Rehwinkel
Sprint
1313 Blair Stone Road
Tallahassee, FL 32301

Joseph P. Cowin
Sprint
7301 College Boulevard
Overland Park, KS 66210



per Kimberly Caswell