# HOPPING GREEN & SAMS

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

www hgss.com

ANGELA R. MORRISON
ERIC T. OLSEN
GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
CAROLYN S. RAEPPLE
DOUGLAS S. ROBERTS
D. KENT SAFRIET
GARY P. SAMS
TIMOTHY G. SCHOENWALDER
DAN R. STENGLE
CHERYL G. STUART
JENNIFER A. TSCHETTER
VICTORIA L. WEBER

OF COUNSEL ELIZABETH C. BOWMAN REX D. WARE

Writer's Direct Dial No (850) 425-2313

March 15, 2002

#### BY E-MAIL AND U.S. MAIL

Kimberly Caswell Vice President and General Counsel Verizon Florida, Inc. 201 North Franklin Street P.O. Box 110 Tampa, FL 33601-0110

Re: Proposal for Mediation

Docket No. 990649B-TP

### Dear Kim:

JAMES S. ALVES

DIANE W. CARR

RALPH A. DEMEO

WILLIAM H. GREEN

MATTHEW L. HICKS

WADE L. HOPPING

GARY K. HUNTER, JR.

ROBERT A. MANNING FRANK E. MATTHEWS

RICHARD D. MELSON

KYLE V. MITCHELL

JONATHAN T. JOHNSON

BRIAN H. BIBEAU

RICHARD S. BRIGHTMAN

T. SPENCER CROWLEY, III

KEVIN B. COVINGTON

BRIAN A. CRUMBAKER

PETER C. CUNNINGHAM

I am writing on behalf of MCI WorldCom (WorldCom) to request that Verizon engage in mediation with WorldCom and other intervenors in this docket in an attempt to resolve the UNE pricing issues that are currently scheduled for hearing before the Commission on April 29 to May 1, 2002.

WorldCom proposes that the mediation be conducted in Tallahassee on two mutually agreeable days during the week of April 1, 2002 and that the parties utilize the services of a trained mediator from the Commission's Office of General Counsel, possibly David Smith. We have not yet contacted Mr. Smith to determine his interest or availability to serve as mediator.

WorldCom has contacted the other parties who are actively participating in this docket. The parties who have responded either actively support (AT&T, FDN, KMC, ITC^DeltaCom) or do not oppose (Z-Tel) an attempt to mediate this dispute. FDN does note that due to resource issues the scope of its participation may be limited. Sprint has not yet advised WorldCom of its position regarding mediation.

DOCUMENT NUMBER DATE

03036 MAR 158

FPSC-CCMMISSION CLERK

Kimberly Caswell March 15, 2002 Page 2

WorldCom's hope is that the mediation will allow the parties to eliminate the need for a hearing, or at least to narrow the issues that require a Commission ruling.

Please let me know as soon as possible if Verizon will agree to mediation and what dates during the week of April 1st are best for your mediation team.

Very truly yours,

Richard D. Melson

### RDM/mee

cc: Certificate of Service

Blanca Bayo (for docket file)

Chairman Jaber

Commissioner Baez

Commissioner Deason

Commissioner Palecki

**Commissioner Bradley** 

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivery (\*) this 15th day of March, 2002.

AT&T Communications of the Southern States, Inc. (GA) Virginia Tate 1200 Peachtree St., Suite 8068 Atlanta, GA 30309

Ausley Law Firm
Jeffrey Wahlen/John Fons
P.O. Box 391
Tallahassee, FL 32302

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

Covad Communications Company Ms. Catherine F. Boone 10 Glenlake Parkway, Suite 650 Altanta, GA 30328-3495

Development Specialists, Inc. Norton Cutler c/o Steve Victor 70 West Madison Street, Suite 2300 Chicago, IL 60602-4250

Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301 Florida Digital Network, Inc. 390 North Orange Ave., Suite 2000 Orlando, FL 32801

KMC Telecom Inc. Mr. John D. McLaughlin, Jr. 1755 North Brown Road Lawrenceville, GA 30034-8119

Katz, Kutter Law Firm Charles Pellegrini/Patrick Wiggins 12th Floor 106 East College Avenue Tallahassee, FL 32301

Kelley Law Firm Genevieve Morelli/Eric Jenkins 1200 19th St. NW, Suite 500 Washington, DC 20036

Kelley Law Firm Jonathan Canis/Michael Hazzard 1200 19th St. NW, Fifth Floor Washington, DC 20036

MCI WorldCom Ms. Donna C. McNulty 325 John Knox Road, Suite 105 Tallahassee, FL 32303-4131

MCI WorldCom, Inc.
Mr. Brian Sulmonetti
Concourse Corporate Center Six
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

Messer Law Firm Norman Horton/Floyd Self/Tracy Hatch 215 South Monroe Street, Suite 710 Tallahassee, FL 32302

Network Access Solutions Corporation Mr. Don Sussman Three Dulles Tech Center 13650 Dulles Technology Drive Herndon, VA 20171-4602

Pennington Law Firm Marc W. Dunbar P.O. Box 10095 Tallahassee, FL 32302

SBC Telecom, Inc. Mr. Kevin Chapman 13th Floor 300 Convent Street San Antonio, TX 78205-3702

Shook, Hardy & Bacon LLP Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington, DC 20005-2004

Sprint-Florida, Incorporated Charles J. Rehwinkel 1313 Blairstone Road Tallahassee, FL 32301-3021

Supra Telecommunications and Information Systems, Inc. Mark E. Buechele Koger Center - Ellis Bldg. 1311 Executive Center Dr., Suite 200 Tallahassee, FL 32301-5027

Swidler Berlin Friedman, LLP Michael Sloan 3000 K St. NW, #300 Washington, DC 20007-5116 Time Warner Telecom of Florida, L.P. Carolyn Marek 233 Bramerton Court Franklin, TN 37069

Verizon Select Services Inc. Kimberly Caswell P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

Z-Tel Communications, Inc. George S. Ford 601 S. Harbour Island Blvd. Tampa, FL 33602-5706

Pie D. M

Attornev