

ORIGINAL



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April 12, 2002

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COMMISSION
CLERK

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

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 filing, please contact me at 813-483-2617.

Sincerely,


Kimberly Caswell

- AUS KC:tas
- CAF Enclosures
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FPSC COMMISSION

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled) Docket No. 990649B-TP
network elements (Sprint/Verizon track)) Filed: April 12, 2002
_____)

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

Christopher S. Huther, Esq.
Megan H. Troy, Esq.
Preston Gates Ellis & Rouvelas Meeds LLP
1735 New York Avenue NW, Suite 500
Washington, DC 20006-5209
Telephone: 202-628-1700
Fax: 202-331-1024
chuther@prestongates.com
megant@prestongates.com

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

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FPSC-COMMISSION CLERK

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. 990649B-TP:

Christopher S. Huther, Esq.
Megan H. Troy, Esq.
Preston Gates Ellis & Rouvelas Meeds LLP
1735 New York Avenue NW, Suite 500
Washington, DC 20006-5209
Telephone: 202-628-1700
Fax: 202-331-1024
chuther@prestongates.com
megant@prestongates.com

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

7. As reflected in Mr. Huther's affidavit, he: (i) is an attorney admitted to practice in the Commonwealth of Virginia and the District of Columbia; (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.

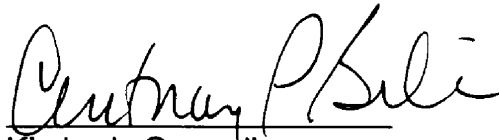
8. Verizon also submits that Ms. Troy possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Troy's qualifications are set forth in the attached affidavit.

9. As reflected in Ms. Troy's affidavit, she: (i) is an attorney admitted to practice in the state of California; (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, Mr. Huther and Ms. Troy 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 Mr. Huther and Ms. Troy be permitted to appear as qualified representatives on behalf of Verizon Florida Inc.

Respectfully submitted on April 12, 2002.

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: Investigation into pricing of)	Docket No. 990649B-TP
unbundled network elements)	Filed: April 12, 2002
(Sprint/Verizon track))	
_____)	

AFFIDAVIT OF CHRISTOPHER S. HUTHER

))
THE DISTRICT OF COLUMBIA))
)

I, Christopher S. Huther, being first duly sworn, do hereby depose and state as follows:

1. I am a Partner in the law firm of Preston Gates Ellis & Rouvelas Meeds LLP, 1735 New York Avenue, N.W., Suite 500, Washington, D.C. 20006.

2. I am a member in good standing of the District of Columbia Bar and the Virginia State Bar 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 proceedings before state regulatory commissions and the Federal Communications Commission on matters involving the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.

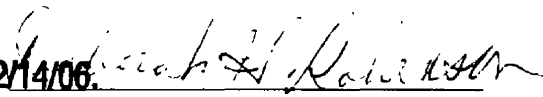
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

I declare that the foregoing is true and correct based on my knowledge,
information and belief.


CHRISTOPHER S. HUTHER

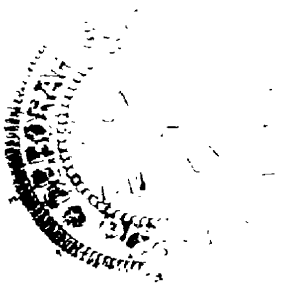
THE DISTRICT OF COLUMBIA

The foregoing instrument was acknowledged before me on this 9th day of April,
2002 by Christopher S. Huther.

My Commission Expires 12/14/06. 
NOTARY PUBLIC

My Commission Expires: _____

[SEAL]



**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of unbundled network elements (Sprint/Verizon track))	Docket No. 990649B-TP
_____)	Filed: April 12, 2002
)	

AFFIDAVIT OF MEGAN H. TROY

THE DISTRICT OF COLUMBIA)
)
)

I, Megan H. Troy, being first duly sworn, do hereby depose and state as follows:

1. I am an attorney with the law firm of Preston Gates Ellis & Rouvelas Meeds LLP, 1735 New York Avenue, N.W., Suite 500, Washington, D.C. 20006.
2. I am a member in good standing of the California State Bar 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 Preston Gates Ellis & Rouvelas Meeds LLP, as counsel to Verizon in proceedings before state regulatory commissions and the Federal Communications Commission on matters involving 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.

Megan Troy
MEGAN H. TROY

THE DISTRICT OF COLUMBIA

The foregoing instrument was acknowledged before me on this 9th day of April,
2002 by Megan H. Troy.

Deborah H. Robinson
NOTARY PUBLIC

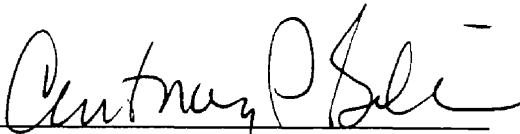
My Commission Expires: _____ **My Commission Expires 12/14/06.**

[SEAL]



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation By Qualified Representatives in Docket No. 990649B-TP were sent via U.S. mail on April 12, 2002 to the parties on the attached list.


for Kimberly Caswell

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