

Kimberly Caswell
Vice President and General Counsel, Southeast
Legal Department



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July 2, 2002

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

RECEIVED FPSC
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COMMISSION
CLERK

Re: Docket No. 020412-TP
Petition for arbitration of unresolved issues in negotiation of interconnection
agreement with Verizon Florida Inc. by US LEC of Florida Inc.

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Request for
Representation by Qualified Representatives for filing 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
Kimberly Caswell

KC:tas
Enclosures

AUS _____
CAF _____
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Henry Jones
7/03/02

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of US LEC of Florida Inc. for arbitration)	Docket No. 020412-TP
with Verizon Florida Inc. pursuant to 47 U.S.C.)	Filed: July 2, 2002
§ 252(b) of the Communications Act of 1934, as)	
amended by 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

Aaron M. Panner, Esq.
 Scott H. Angstreich, Esq.
 Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C.
 1615 M Street, N.W., Suite 400
 Washington, DC 20036
 Telephone: 202-326-7900
 Fax: 202-326-7999

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

DOCUMENT NUMBER-DATE

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FDSP-COMMISSION CLERK

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. 020412-TP:

Aaron M. Panner, Esq.
Scott H. Angstreich, Esq.
Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, DC 20036
Telephone: 202-326-7900
Fax: 202-326-7999

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

7. As reflected in Mr. Panner's affidavit, he: (i) is an attorney admitted to practice in the state(s) of Massachusetts, New York 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 Mr. Angstreich possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Mr. Angstreich's qualifications are set forth in the attached affidavit.

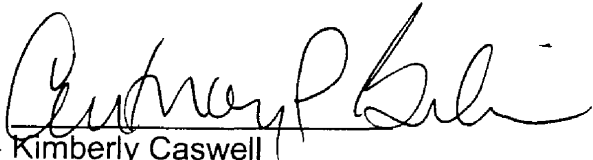
9. As reflected in Mr. Angstreich's affidavit, he: (i) is an attorney admitted to practice in the state(s) of New York and the District of Columbia; (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction; (iii) has reviewed the Florida Rules of Civil Procedure 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.

10. Consistent with the standard set forth in Rule 28-106.107, Mr. Panner and Mr. Angstreich 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. Panner and Mr. Angstreich be permitted to appear as qualified representatives on behalf of Verizon Florida Inc.

Respectfully submitted on July 2, 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

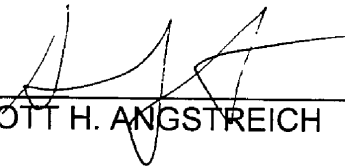
In re: Petition for arbitration of unresolved issues) Docket No. 020412-TP
in negotiation of interconnection agreement with) Filed: July 2, 2002
Verizon Florida Inc. by US LEC of Florida Inc.)
_____)

AFFIDAVIT OF SCOTT H. ANGSTREICH

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

1. I am an attorney with the law firm of Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., 1615 M Street, N.W., Suite 400, Washington, DC 20036.
2. I am a member in good standing in the State of New York and the District of Columbia 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 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.



SCOTT H. ANGSTREICH

The foregoing instrument was acknowledged before me this 1st day of July,
2002, by Scott H. Angstreich.



NOTARY PUBLIC

My Commission Expires 09/14/05

My Commission Expires: _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of unresolved issues) Docket No. 020412-TP
in negotiation of interconnection agreement with) Filed: July 2, 2002
Verizon Florida Inc. by US LEC of Florida Inc.)
_____)

AFFIDAVIT OF AARON M. PANNER

I, Aaron M. Panner, being first duly sworn, do hereby depose and state as follows:

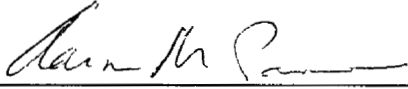
1. I am an attorney with the law firm of Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., 1615 M Street, N.W., Suite 400, Washington, DC 20036.

2. I am a member in good standing in the State of Massachusetts, State of New York, and the District of Columbia 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 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.


AARON M. PANNER

The foregoing instrument was acknowledged before me this 1st day of July,
2002, by Aaron M. Panner.


NOTARY PUBLIC

My Commission Expires: My Commission Expires 09/14/05

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation by Qualified Representatives in Docket No. 020412-TP were sent via U.S. mail on July 3, 2002 to the parties on the attached list.



Kimberly Caswell

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

Kenneth Hoffman
Martin McDonnell
Rutledge Law Firm
215 S. Monroe Street, Suite 420
Tallahassee, FL 32301

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Washington, DC 20007

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1515 N. Courthouse Road
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Arlington, VA 22201

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