

Kimberly Caswell  
Vice President and General Counsel, Southeast  
Legal Department



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October 3, 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

Re: Docket No. 020960-TP  
Petition for arbitration of open issues resulting from interconnection  
negotiations with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a  
Covad Communications Company

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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CAF \_\_\_\_\_ Enclosures  
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE

10691 OCT-3 02

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for arbitration of open issues resulting )  
from interconnection negotiations with Verizon Florida )  
Inc. by DIECA Communications, Inc. d/b/a )  
Covad Communications Company )  
\_\_\_\_\_ )

Docket No. 020960-TP  
Filed: October 3, 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

Aaron M. Panner, Esq.  
Scott H. Angstreich, Esq.  
Teal E. Luthy, 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

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

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. 020960-TP:

Aaron M. Panner, Esq.  
Scott H. Angstreich, Esq.  
Teal E. Luthy, 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, Mr. Angstreich, and Ms. Luthy 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. Verizon also submits that Ms. Luthy possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Luthy's qualifications are set forth in the attached affidavit.

11. As reflected in Ms. Luthy's affidavit, she: (i) is an attorney admitted to practice in 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.

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

Respectfully submitted on October 3, 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 open issues resulting ) Docket No. 020960-TP  
from interconnection negotiations with Verizon Florida )  
Inc. by DIECA Communications, Inc. d/b/a )  
Covad Communications Company )  
\_\_\_\_\_ )

**AFFIDAVIT OF AARON M. PANNER**

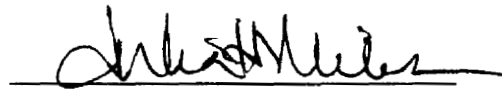
I, Aaron M. Panner, being first duly sworn, do hereby depose and state as follows:

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 October,  
2002, by Aaron M. Panner.

  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
**My Commission Expires 09/14/05**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for arbitration of open issues resulting ) Docket No. 020960-TP  
from interconnection negotiations with Verizon Florida )  
Inc. by DIECA Communications, Inc. d/b/a )  
Covad Communications Company )  
\_\_\_\_\_ )

**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 October,  
2002, by Scott H. Angstreich.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_ **My Commission Expires 09/14/05**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for arbitration of open issues resulting ) Docket No. 020960-TP  
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Inc. by DIECA Communications, Inc. d/b/a )  
Covad Communications Company )  
\_\_\_\_\_ )

**AFFIDAVIT OF TEAL E. LUTHY**

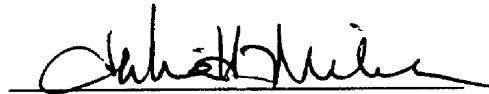
I, Teal E. Luthy, being first duly sworn, do hereby depose and state as follows:

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 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.

  
TEAL E. LUTHY

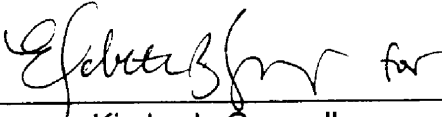
The foregoing instrument was acknowledged before me this 1st day of October,  
2002, by Teal E. Luthy.

  
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. 020960-TP were sent via U.S. mail on October 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

Vicki Gordon Kaufman  
McWhirter Reeves Law Firm  
117 South Gadsden Street  
Tallahassee, FL 32301

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1230 Peachtree Street N.E.  
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Atlanta, GA 30309

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Covad Comm. Co.  
227 West Monroe, 20<sup>th</sup> Floor  
Chicago, IL 60606

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1515 N. Courthouse Road  
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