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Kimberly Caswell  
Vice President and General Counsel, Southeast  
Legal Department

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

February 10, 2003

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


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Re: Docket No. 011666-TP  
Petition by Global NAPS, Inc. for arbitration pursuant to 47 U.S.C. 252(b) of  
interconnection, rates, terms and conditions with Verizon Florida Inc.

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of the Errata to the Prehearing  
Statements filed by Global NAPs, Inc. and Verizon Florida Inc. 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

KC:tas  
Enclosures

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DOCUMENT NUMBER 01348

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FPSC-CD. PUBLIC CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Global NAPs, Inc. for ) Docket No. 011666-TP  
Arbitration Pursuant to 47 U.S.C. 252(b) ) Filed: February 10, 2003  
of Interconnection Rates, Terms and )  
Conditions with Verizon Florida Inc. )  
\_\_\_\_\_ )

**ERRATA TO THE PREHEARING STATEMENTS FILED BY  
GLOBAL NAPs, INC. AND VERIZON FLORIDA INC.**

Global NAPs, Inc. ("Global") and Verizon Florida Inc. ("Verizon") file the following joint errata to their respective Prehearing Statements to make the following corrections:

- Remove reference to William J. Rooney as a witness for Global;
- Revise the list of issues on which Global witness Selwyn will testify; and
- Add reference to Kevin Collins as a witness for Verizon.

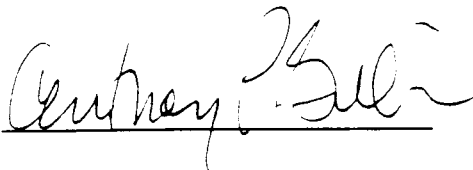
In Global's Prehearing Statement at page 1, Global inadvertently listed Mr. William J. Rooney as a witness in this proceeding. Mr. Rooney, however, did not provide any pre-filed direct, supplemental direct, or rebuttal testimony in this proceeding. Accordingly, Global's Prehearing Statement should be revised to remove the reference to Mr. Rooney as a witness for Global. Attached to this Errata is a replacement page 1 for Global's Prehearing Statement.

In Global's Prehearing Statement at page 9, Global identified the issues on which Global witness Selwyn will testify as Issues 1, 2, 4, and 5. Global witness Selwyn, however, did not provide any pre-filed direct, supplemental direct, or rebuttal testimony in this proceeding on Issue 2 (two-way trunks). Accordingly, the list of issues on which Global witness Selwyn will testify should be revised to omit a reference to Issue 2. Attached to this Errata is a replacement page 9 for Global's Prehearing Statement.

DOCUMENT NUMBER-DATE  
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FPSC-COMMISSION CLERK

In Verizon's Prehearing Statement at page 1, Verizon inadvertently omitted Kevin Collins from its list of witnesses. On January 16, 2003, Mr. Collins filed rebuttal testimony on behalf of Verizon for Issues 1 and 5. Accordingly, Mr. Collins should be listed as one of Verizon's witnesses in its Prehearing Statement. Attached to this Errata is a replacement page 1 for Verizon's Prehearing Statement.

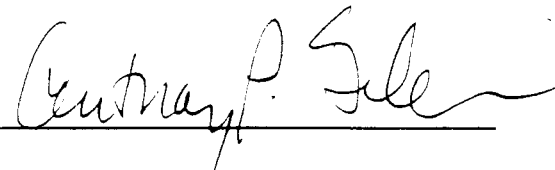
Respectfully submitted on February 10, 2003.

BY: 

*for* JON C. MOYLE, JR.  
CATHY M. SELLERS  
Moyle, Flanigan, Katz, Raymond  
& Sheehan, P.A.  
The Perkins House  
118 North Gadsen Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: (850) 681-8788

JAMES R.J. SCHELTEMA,  
Director of Regulatory Affairs  
Global NAPs, Inc.  
10861 Lockwood Drive  
Silver Spring, MD 20901  
Phone: (617) 504-5513

Attorneys for Global NAPs South,  
Inc.

BY: 

*for* KIMBERLY CASWELL  
P. O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Phone: (813) 483-2617  
Fax: (813) 204-8870

RICHARD CHAPKIS  
Vice President & General Counsel  
Verizon Florida Inc.  
112 South Lakeview Canyon Road  
CA501LB  
Thousand Oaks, CA 91362  
Phone: (805) 372-6233  
Fax: (805) 373-7515

KELLY L. FAGLIONI  
EDWARD P. NOONAN  
Hunton & Williams  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, VA 23219  
Phone: (804) 788-8200  
Fax: (804) 788-8218

Attorneys for Verizon Florida Inc.

**CORRECTED PAGES 1 AND 9 FOR GLOBAL NAPs, INC.**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Global NAPs South, Inc.  
Petition for Arbitration Pursuant  
To 47 U.S.C. §252(b) of Interconnection  
Rates, Terms and Conditions with  
Verizon Florida, Inc., *f/k/a* GTE Florida, Inc.

Docket No. 011666-TP  
Filed: February 3, 2003

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**PREHEARING STATEMENT OF GLOBAL NAPs SOUTH, INC.**

Pursuant to Order No. PSC-02-0430-PCO-TP and Rule 28-106.209, Global NAPs South, Inc.  
files its Prehearing Statement.

**A. APPEARANCES:**

Jon C. Moyle, Jr.  
Florida Bar No. 727016  
Cathy M Sellers  
Florida Bar No. 0784958  
Moyle, Flanigan, Katz, Raymond & Sheehan, P.A.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, Florida 32301

James R. J. Scheltema  
By Pro Hac Vice  
Director, Regulatory Affairs  
Global NAPs, Inc.  
5042 Durham Road West  
Columbia, Maryland 21044-1445

**On behalf of Global NAPs South, Inc., Petitioner**

**B. WITNESSES:**

Dr. Lee L. Selwyn

**ISSUE 10:**

A change in law should be implemented when there is a final adjudicatory determination which materially affects the terms and/or conditions under which the parties' exchange traffic.

**Issue 11:**     *Should GNAPs be permitted access to network elements that have not already been ordered unbundled?*

**ISSUE 11:**

Global wants some protections that as a customer it will (a) have access to the same technologies deployed in Verizon's network and (b) Verizon will not deploy new technologies which will affect Global's service quality without adequate advanced notice and testing.

**F.     STATEMENT OF WITNESS RESPONSIBILITIES:**

Dr. Lee L. Selwyn will be responsible for issues 1, 4 & 5.

**G.     QUESTIONS OF FACT AND LAW:**

Although the Order requests separate statements regarding factual vs. legal questions, as noted from the above delineation of the issues, these are often intertwined.

**H.     STIPULATED ISSUES:**

No additional issues have been stipulated to at this time.

**I.     PENDING MOTIONS:**

Global NAPs South, Inc. has filed, contemporaneously with the filing of its Prehearing

**CORRECTED PAGE 1 FOR VERIZON FLORIDA INC.**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Global NAPs, Inc. for ) Docket No. 011666-TP  
Arbitration Pursuant to 47 U.S.C. 252(b) ) Filed: February 3, 2003  
of Interconnection Rates, Terms and )  
Conditions with Verizon Florida Inc. )

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**VERIZON FLORIDA INC.'S PREHEARING STATEMENT**

Verizon Florida Inc. ("Verizon") files its Prehearing Statement in accordance with Order number PSC-02-0430-PCO-TP, entered in this matter on March 29, 2002.

**A. Witnesses**

Verizon's witnesses in this proceeding and the issues to which they will testify are as follows:

Peter D'Amico: Issues 1, 2, and 3  
Terry Haynes: Issues 4 and 5  
Kevin Collins: Issues 1 and 5  
Karen Fleming: Issue 8  
Jonathan Smith: Issue 9

**B. Exhibits**

Verizon will introduce the following exhibits:

1. Attachment A (Proposed Contract Language for Issue 1) to Verizon witness D'Amico's supplemental direct testimony.
2. Attachment A (Proposed Contract Language for Issue 5) to Verizon witness Haynes' supplemental direct testimony.
3. Global NAPs, Inc.'s responses to Verizon's discovery requests.
4. Global NAPs, Inc.'s Local Exchange Price List.
5. Map of Florida showing LATA boundaries.



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the Errata to the Prehearing Statements filed by Global NAPs, Inc. and Verizon Florida Inc. in Docket No. 011666-TP were sent via electronic mail and U. S. mail on February 10, 2003 to the following:

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

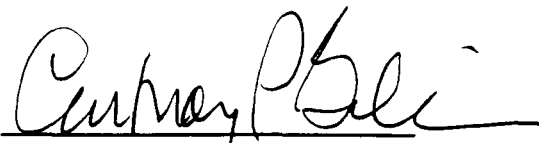
John C. Dodge, Esq.  
David N. Tobenkin, Esq.  
Cole, Raywid & Braverman, L.L.P.  
1919 Pennsylvania Avenue, N.W., 2<sup>nd</sup> Floor  
Washington, DC 20006

Jon C. Moyle, Esq.  
Moyle Flanigan Katz Raymond & Sheehan P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301

William J. Rooney, Jr., Esq.  
Vice President and General Counsel  
Global NAPS, Inc.  
89 Access Road  
Norwood, MA 02062

James R. J. Scheltema  
Director-Regulatory Affairs  
Global NAPs, Inc.  
5042 Durham Road West  
Columbia, MD 21044

Kelly L. Faglioni, Esq.  
Edward P. Noonan, Esq.  
Hunton & Williams  
Riverfront Plaza, East Tower  
951 E. Byrd Street  
Richmond, VA 23219-4074

  
Kimberly Caswell