

Kimberly Caswell
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Legal Department

ORIGINAL



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February 17, 2003

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

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COMMISSION
CLERK

Re: Docket No. 000121C-TP
Investigation into the establishment of operations support systems permanent
performance measures for incumbent local exchange telecommunications
companies (Verizon Florida track)

- AUS _____
- CAF _____
- CMP _____
- COM 5 _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Request For
Representation By Qualified Representative 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

RECEIVED & FILED

R.V.N.

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01567 FEB 17 03

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of)
operations support systems permanent)
performance measures for incumbent local)
exchange telecommunications companies)
(Verizon Florida track))
_____)

Docket No. 000121C-TP
Filed: February 17, 2003

REQUEST FOR REPRESENTATION BY QUALIFIED REPRESENTATIVE

Verizon Florida Inc. (Verizon), through its undersigned counsel, submits its Request for Representation by Qualified Representative 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 individual:

Richard A. Chapkis, Esq.
Verizon Florida Inc.
201 N. Franklin Street, FLTC0007
Tampa, Florida 33602
Telephone: 813-483-2606
Fax: 813-204-8870

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 individual identified below to appear as qualified representative on behalf of Verizon for any purpose and in

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

all matters or proceedings conducted before the Commission in connection with Docket No. 000121C-TP:

Richard A. Chapkis, Esq.
Verizon Florida Inc.
201 N. Franklin Street, FLTC0007
Tampa, Florida 33602
Telephone: 813-483-2606
Fax: 813-204-8870

5. Consistent with Rule 28-106.106(2)(b), Verizon hereby affirms that it is aware of the services Mr. Chapkis 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).

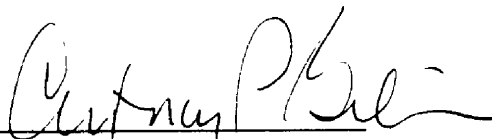

6. Verizon submits that Mr. Chapkis possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Mr. Chapkis' qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Chapkis' affidavit, he: (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.

8. Consistent with the standard set forth in Rule 28-106.107, Mr. Chapkis has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Verizon is concerned in the above-referenced proceeding.

WHEREFORE, for the foregoing reasons, Verizon Florida Inc. requests that Mr. Chapkis be permitted to appear as a qualified representative on behalf of Verizon Florida Inc.

Respectfully submitted on February 17, 2003.

By: 
or  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 the establishment of)	Docket No. 000121C-TP
operations support systems permanent)	
performance measures for incumbent local)	
exchange telecommunications companies)	
(Verizon Florida track))	
_____)	

AFFIDAVIT OF RICHARD A. CHAPKIS

I, Richard A. Chapkis, being first duly sworn, do hereby depose and state as follows:

1. I am Vice President-General Counsel for the Southeast Region of Verizon with offices at 201 N. Franklin Street, 16th floor, FLTC0007, Tampa, FL 33602.

2. I am a member in good standing in the State of California and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.

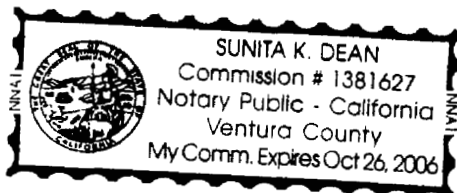
3. I have served as counsel to Verizon in state proceedings before state commissions. Moreover, I have served as counsel and assisted other attorneys in proceedings before the California Public Utilities Commission that have involved the examination and resolution of factual and legal issues similar 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.

Richard A. Chapkis
RICHARD A. CHAPKIS

The foregoing instrument was acknowledged before me this 13th day of February, 2003, by Richard A. Chapkis.

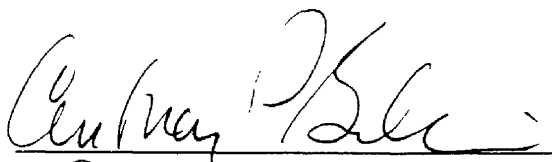



Sunita K. Dean
NOTARY PUBLIC

My Commission Expires: 10-26-2006

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation By Qualified Representative in Docket No. 000121C-TP were sent via U.S. mail on February 17, 2003 to the parties on the attached list.



 Kimberly Caswell

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