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PLEASE REPLY TO:

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TALLAHASSEE OFFICE:
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TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

June 9, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

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Re: Docket No.: 981834-TP and 990321-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Request for Representation by a Qualified Representative Charles E. Watkins.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/bae
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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN & ARNOLD, P.A.

DOCUMENT NUMBER - DATE

05117 JUN-9 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers
for Commission action to support local
competition in BellSouth Telecommunications,
Inc.'s service territory

Docket No. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications,
Inc., Sprint-Florida, Incorporated, and GTE
Florida Incorporated comply with obligation
to provide alternative local exchange carriers
with flexible, timely, and cost-efficient
physical collocation.

Docket No. 990321-TP

Filed: June 9, 2003

**REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE,
CHARLES E. WATKINS**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), through
its undersigned counsel, submits its Request for Representation by a Qualified Representative,
Charles E. Watkins, pursuant to Rule 28-106.106, Florida Administrative Code, in the above-
referenced proceeding, and states as follows:

1. Covad is a certified telecommunications carrier authorized to provide
telecommunications services in the state of Florida. Covad is located at 1230 Peachtree Street,
N.E., 19th Floor, Atlanta, GA 30309.

2. Any pleading, motion, notice, order or other document required to be served upon
Covad or filed by any party relative to this Request for Representation should be served upon the
following individual:

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Decker Kaufman & Arnold, P.A.
117 South Gadsden Street

DOCUMENT NUMBER 2003

05117 JUN-98

FPSC-COMMISSION CLERK

Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that Covad submit a written request to the presiding officer in the event that Covad elects to be represented before the Commission by a qualified representative. Covad hereby submits such a request.

4. Covad seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of Covad for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket Nos. 981834-TP and 990321-TP.

Charles E. Watkins
Covad Communications Co.
1230 Peachtree Street, N.E., 19th Floor
Atlanta, GA 30309
(404) 942-3492 (telephone)
(404) 942-3495 (fax)
g Watkins@covad.com

5. Consistent with Rule 28-106.106(2)(b), Covad hereby affirms that it is aware of the services Mr. Watkins can provide and, further, that Covad can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1). Indeed, Covad has elected to be represented in this matter by other attorneys in addition to Mr. Watkins.

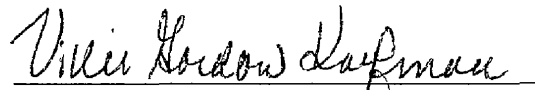
6. Covad submits that Mr. Watkins possesses the necessary qualifications to responsibly represent Covad’s interests in this matter. In this regard, Mr. Watkins’ qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Watkins’ affidavit, attached as “Attachment A,” he: (i) is an attorney admitted to practice in the State of Georgia; (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. Watkins has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Covad is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, Covad requests that Mr. Watkins be permitted to appear as a qualified representative on behalf of Covad.



Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, P.A.
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vkaufman@mac-law.com

Attorneys for DIECA Communications, Inc.
d/b/a Covad Communications, Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory.

Docket No.: 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation to Ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated Comply with Obligation to Provide Alternative Local Exchange Carriers with Flexible, Timely, and Cost-Efficient Physical Collocation.

Docket No. 990321-TP

Filed: June 9, 2003

AFFIDAVIT OF CHARLES E. WATKINS

STATE OF GEORGIA
COUNTY OF FULTON

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

1. I am Senior Counsel for Covad Communications Company, 1230 Peachtree Street, N.E., 19th Floor, Atlanta, GA 30309.

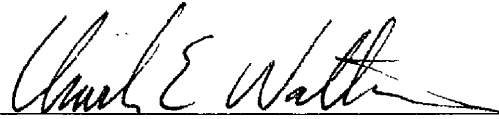
2. I am a member in good standing of the Georgia Bar and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.

3. I have served as regulatory counsel to Covad Communications Company in proceedings before state commissions. Moreover, I have assisted other attorneys in proceedings before other state commissions 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

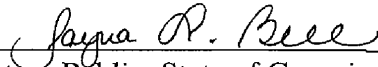
of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

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



CHARLES E. WATKINS

SWORN TO AND SUBSCRIBED before me this 6th day of June, 2003 by Charles E. Watkins, who () is personally known to me; or () who has presented _____ as identification.



Notary Public, State of Georgia, County of Fulton

Commission Number: _____

My Commission expires: 3/18/2006

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Representation by a Qualified Representative, Charles Watkins has been furnished by (*) hand delivery, (**) electronic mail and U.S. Mail this 9th day of June, 2003, to the following:

(*) Beth Keating
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

(**) Jeff Wahlen
Ausley Law Firm
Post Office Box 391
Tallahassee, Florida 32302

(**) Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

(**) Terry Monroe/Genevieve Morelli
CompTel
1900 M Street, NW
Suite 800
Washington, DC 20036

(**) Michael A. Gross
Florida Cable Telecommunications
Association, Inc.
246 East 6th Avenue, Suite 100
Tallahassee, Florida 32303

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(**) Susan Masterton
Charles Rehwinkel
Sprint Communications Company
Post Office Box 2214
MC: FLTLHO0107
Tallahassee, Florida 32316-2214

(**) Ann Shelfer
Supra Telecommunications
1311 Executive Center Drive, Suite 200
Tallahassee, Florida 32301

(**) Andrew Isar
Telecommunications Resellers Assoc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335

(**) Floyd Self
Messer Caparello & Self
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Tallahassee, FL 32302-1876

(**) Virginia Tate
AT&T Communications
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

(**) Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue, Suite 2000
Orlando, Florida 32801

(**) Robert Waldschmidt
Howell & Fisher
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201

(**) Richard Heatter
Mpower Communications Corp.
175 Sully's Trail, Suite 300
Pittsford, NY 14534

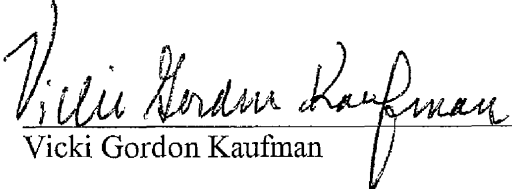
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Tampa, Florida 33601-0110

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Washington, DC 20037

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Tallahassee, Florida 32301-1549

(**) Nanette S. Edwards
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Huntsville, Alabama 35802-4342


Vicki Gordon Kaufman