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Legal Department

ORIGINAL



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030677-TP

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July 24, 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

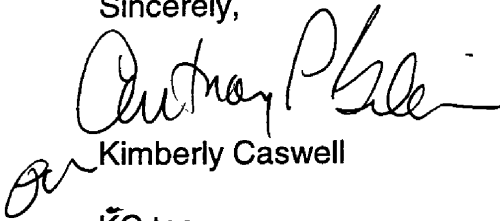
JUL 24 AM 10:28  
COMMISSION  
CLERK

Re: Docket No.  
Verizon Florida Inc.'s Petition and Complaint Regarding Customer Transfer  
Charges Imposed by TCG South Florida

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of Verizon Florida Inc.'s  
Request for Representation By Qualified Representative in the above matter. Service  
has been made as indicated on the Certificate of Service. If there are any questions  
regarding this filing, please contact me at 813-483-2617.

Sincerely,

  
Kimberly Caswell

KC:tas  
Enclosures

DOCUMENT ACCEPTED  
06675 JUL 24 03  
FPSC-COMMISSION CLERK

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RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Verizon Florida Inc.'s Petition and )  
Complaint Regarding Customer Transfer )  
Charges Imposed by TCG South Florida )  
\_\_\_\_\_ )

Docket No. 030677-TP  
Filed: July 24, 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  
Verizon Florida Inc.  
201 N. Franklin Street, FLTC0717  
Tampa, Florida 33602  
Telephone: 813-483-1256  
Fax: 813-273-9825

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.

DOCUMENT MADE PUBLIC

06675 JUL 24 03

FPSC-SECRETARY'S OFFICE CLERK

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 all matters or proceedings conducted before the Commission in connection with this matter:

Richard A. Chapkis  
Verizon Florida Inc.  
201 N. Franklin Street, FLTC0007  
Tampa, Florida 33602  
Telephone: 813-483-1256  
Fax: 813-273-9825

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.

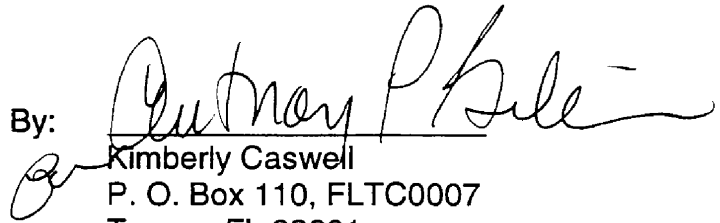
7. As reflected in Mr. Chapkis' affidavit, he: (i) is an attorney admitted to practice in the state of California; (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction; (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative 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 July 24, 2003.

By:

A handwritten signature in black ink, appearing to read "Kimberly Caswell", written over a horizontal line.

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: Verizon Florida Inc.'s Petition and )  
Complaint Regarding Customer Transfer ) Docket No.  
Charges Imposed by TCG South Florida ) Filed: July 24, 2003  
\_\_\_\_\_ )

**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, 16<sup>th</sup> 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.

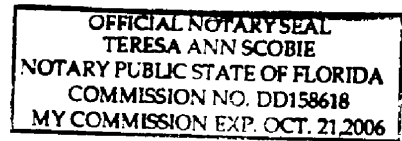
I declare that the foregoing is true and correct based on my knowledge, information and belief.

Richard A. Chapkis  
RICHARD A. CHAPKIS

The foregoing instrument was acknowledged before me this 23<sup>rd</sup> day of July, 2003, by Richard A. Chapkis.

Teresa Ann Scobie  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

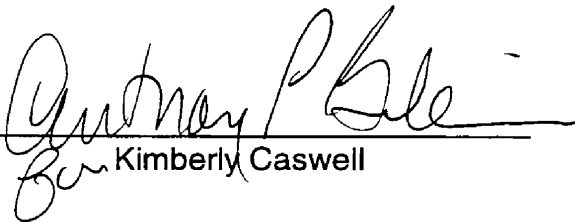


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation By Qualified Representative were sent via overnight mail(\*) on July 23, 2003 and U.S. mail(\*\*) on July 24, 2003 to:

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

Lisa A. Riley, Docket Manager(\*\*)  
TCG South Florida  
1200 Peachtree Street, N.E.  
Suite 8026  
Atlanta, GA 30309-3579

  
\_\_\_\_\_  
For Kimberly Caswell