

ORIGINAL

Kimberly Caswell  
Associate General Counsel  
Legal Department



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August 29, 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

RECEIVED FPSC  
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COMMISSION  
CLERK

Re: Docket No. 030746-TP  
Complaint of Cargill Crop Nutrition, Inc. against Verizon Florida Inc. for  
enforcement of Order PSC-97-0385-FOF-TL to eliminate application and  
associated charges of Verizon General Service Tariff 113.2, and request for  
relief

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 filing, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of Cargill Crop Nutrition, Inc. )  
against Verizon Florida Inc. for enforcement )  
of Order PSC-97-0385-FOF-TL to eliminate )  
application and associated charges of )  
Verizon General Service Tariff 113.2, )  
and request for relief )  
\_\_\_\_\_ )

Docket No. 030746-TP  
Filed: August 29, 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, FLTC0007  
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 NUMBER-DATE

08088 AUG 29 8

FPSC-COMMISSION 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 Docket No. 030746-TP:

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).

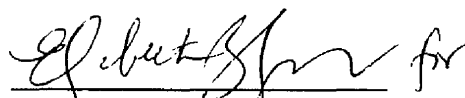
6. Verizon submits that Mr. Chapkis possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Mr. Chapkis' qualifications are set forth in the attached affidavit.

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 August 29, 2003.

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: Complaint of Cargill Crop Nutrition, Inc. ) Docket No. 030746-TP  
against Verizon Florida Inc. for enforcement ) Filed: August 29, 2003  
of Order PSC-97-0385-FOF-TL to eliminate )  
application and associated charges of )  
Verizon General Service Tariff 113.2, )  
and request for relief )  
\_\_\_\_\_ )

**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.

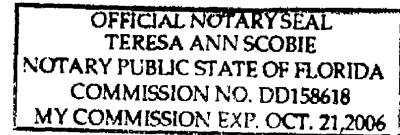
I declare that the foregoing is true and correct based on my knowledge, information and belief.

Richard A. Chapkis  
RICHARD A. CHAPKIS

The foregoing instrument was acknowledged before me this 28<sup>th</sup> day of August, 2003, by Richard A. Chapkis.

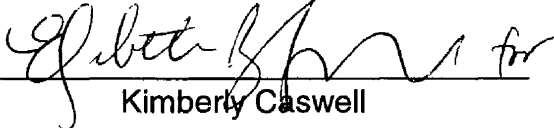
Teresa Ann Scobie  
NOTARY PUBLIC

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



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc's Request for Representation By Qualified Representative in Docket No. 030746-TP were sent via U.S. mail on August 29, 2003 to the parties on the attached list.

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

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

Raymond W. Smith  
Williams Management Services  
821 South Orleans  
Tampa, FL 33606

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Cargill Phosphate Production  
8813 Highway 41 South  
Riverview, FL 33569

Stephen Murray  
IT Infrastructure Manager  
Cargill Crop Nutrition  
8813 Highway 41 South  
Riverview, FL 33569

R. Vernon Williams  
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1413 Emerald Creek Drive  
Valrico, FL 33594