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October 8, 2003

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

Re: **Verizon's Response to BellSouth's and FCCA's Proposed Modifications to Orders Establishing Procedure; Docket Nos. 030851-TP & 030852-TP**

Dear Ms. Bayó:

I am writing to provide Verizon's input on the document entitled "Proposed Modifications to Orders Establishing Procedure" ("Proposed Modifications"), which BellSouth and FCCA distributed at the October 6th procedural conference in the above-referenced matter.

As a general matter, Verizon does not oppose the Proposed Modifications. Verizon does, however, have concerns regarding the sections relating to discovery (Sections (2)(A) and 2(B)). Those sections purport to impose discovery limitations/obligations on the parties that are linked to the BellSouth footprint. For example, Section (2)(A)(i) provides that discovery obtained in other states in the BellSouth region shall be available for use in Florida or, where appropriate, in appeals from FPSC orders to a court of competent jurisdiction or the FCC, and Section (2)(B)(i) provides that once a witness has been deposed regarding his testimony in any state in the BellSouth region, that witness may only be deposed again under certain limited circumstances.

Because Verizon's footprint is different than BellSouth's and Verizon will not be an active participant in every state in the BellSouth footprint (e.g., Verizon does not have operations in Tennessee), Verizon opposes including these provisions in the Procedural Order. As discussed at the Procedural Conference, the issues addressed in Sections (2)(A) and (2)(B) would best be resolved through stipulations between the parties, as opposed to through changes to the Procedural Order.

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Thank you for your attention to this matter.

Sincerely,

Richard A Chapkis
Vice President & General Counsel –
Southeast Region