

ORIGINAL



Richard A. Chapkis
Vice President -- General Counsel, Southeast Region
Legal Department

FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-1256
Fax 813 273-9825
richard.chapkis@verizon.com

February 12, 2004

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
FEB 13 AM 11:24
COMMISSION
CLERK

Re: Docket No. 030851-TP
Implementation of requirements arising from Federal Communications
Commission's triennial UNE Review: Local Circuit Switching for Mass Market
Customers

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Request for
Representation By Qualified Representatives 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 813-483-1256.

Sincerely,

Richard A. Chapkis

Richard A. Chapkis

RAC:tas
Enclosures

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

AUS _____
CAF _____
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SEC 1
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's)
triennial UNE Review: Local Circuit Switching)
for Mass Market Customers)
_____)
Docket No. 030851-TP
Filed: February 12, 2004

REQUEST FOR REPRESENTATION BY QUALIFIED REPRESENTATIVES

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

Richard Chapkis, Esq.
Verizon Florida Inc.
201 N. Franklin Street, FLTC0007
Tampa, Florida 33602
Telephone: 813-483-1256
Fax: 813-204-8870

Catherine K. Ronis, Esq.
Meredith B. Halama, Esq.
Janis C. Kestenbaum, Esq.
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
Telephone: 202-663-6000
Fax: 202-663-6363

DOCUMENT NUMBER-DATE

02066 FEB 13 3

FPSC-COMMISSION CLERK

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 individuals identified below to appear as qualified representatives on behalf of Verizon for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 030851-TP:

Catherine K. Ronis, Esq.
Meredith B. Halama, Esq.
Janis C. Kestenbaum, Esq.
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
Telephone: 202-663-6000
Fax: 202-663-6363

5. Consistent with Rule 28-106.106(2)(b), Verizon hereby affirms that it is aware of the services Ms. Ronis, Ms. Halama and Ms. Kestenbaum 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 Ms. Ronis possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Ronis' qualifications are set forth in the attached affidavit.

7. As reflected in Ms. Ronis' affidavit, she: (i) is an attorney admitted to practice in the District of Columbia; (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. Verizon also submits that Ms. Halama possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Halama's qualifications are set forth in the attached affidavit.

9. As reflected in Ms. Halama's affidavit, she: (i) is an attorney admitted to practice in the State of Illinois and the District of Columbia; (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.

10. Verizon also submits that Ms. Kestenbaum possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Ms. Kestenbaum's qualifications are set forth in the attached affidavit.

11. As reflected in Ms. Kestenbaum's affidavit, she: (i) is an attorney admitted to practice in the District of Columbia; (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.

12. Consistent with the standard set forth in Rule 28-106.107, Ms. Ronis, Ms. Halama and Ms. Kestenbaum have acquired or will acquire actual knowledge of the factual and legal issues involved insofar as their representation of Verizon is concerned in the above-referenced proceedings.

WHEREFORE, for the foregoing reasons, Verizon Florida Inc. requests that Ms. Ronis, Ms. Halama and Ms. Kestenbaum be permitted to appear as qualified representatives on behalf of Verizon Florida Inc.

Respectfully submitted on February 12, 2004.

By: Richard A. Chapkis
Richard Chapkis
P. O. Box 110, FLTC0007
Tampa, FL 33601
Telephone: 813-483-1256

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising) Docket No. 030851-TP
from Federal Communications Commission's)
triennial UNE Review: Local Circuit Switching)
for Mass Market Customers)
_____)

AFFIDAVIT OF CATHERINE K. RONIS

I, Catherine K. Ronis, being first duly sworn, do hereby depose and state as follows:

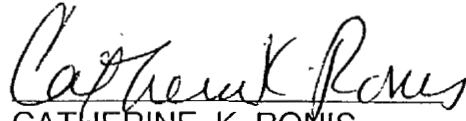
1. I am a Partner with Wilmer Culter Pickering LLC, outside counsel for Verizon Florida Inc. in the above-captioned case.

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

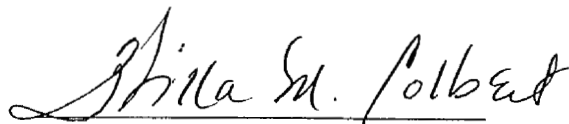
3. I have served as counsel to Verizon and have assisted other attorneys in numerous state proceedings before state commissions that have involved the examination and resolution of factual and legal issues similar to those under consideration in the above-captioned docket.

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.


CATHERINE. K. RONIS

The foregoing instrument was acknowledged before me this 10th day of February, 2004, by Catherine K. Ronis.


NOTARY PUBLIC

My Commission Expires: Feb. 14, 2004

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising) from Federal Communications Commission's) triennial UNE Review: Local Circuit Switching) for Mass Market Customers) _____)	Docket No. 030851-TP
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AFFIDAVIT OF MEREDITH B. HALAMA

I, Meredith B. Halama, being first duly sworn, do hereby depose and state as follows:

1. I am an associate with Wilmer Culter Pickering LLC, outside Counsel for Verizon Florida Inc. in the above-captioned case.
2. I am a member in good standing in the States of Illinois and the District of Columbia 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 and have assisted other attorneys in numerous state proceedings before 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.

Meredith B. Halama
MEREDITH B. HALAMA

The foregoing instrument was acknowledged before me this 10th day of February, 2004, by Meredith B. Halama.

Shila M. Folbert
NOTARY PUBLIC

My Commission Expires: Feb. 14, 2004

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising) Docket No. 030851-TP
from Federal Communications Commission's)
triennial UNE Review: Local Circuit Switching)
for Mass Market Customers)
_____)

AFFIDAVIT OF JANIS C. KESTENBAUM

I, Janis C. Kestenbaum, being first duly sworn, do hereby depose and state as follows:

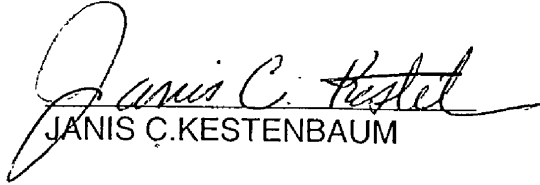
1. I am Counsel with Wilmer Culter Pickering LLC, outside counsel for Verizon Florida Inc. in the above-captioned case.

2. I am a member in good standing in the District of Columbia 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 and have assisted other attorneys in numerous state proceedings before 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.


JANIS C. KESTENBAUM

The foregoing instrument was acknowledged before me this 10th day of February, 2004, by Janis C. Kestenbaum.


NOTARY PUBLIC

My Commission Expires: Feb. 14, 2004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Representation By Qualified Representatives in Docket No. 030851-TP were sent via electronic mail and U. S. mail on February 12, 2004 to:

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

Nancy White c/o Nancy Sims
BellSouth Telecomm. Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Tracy Hatch
AT&T
101 N. Monroe, Suite 700
Tallahassee, FL 32301

Michael Gross
Florida Cable Telecomm. Assn.
246 East 6th Avenue
Tallahassee, FL 32303

Susan Masterton
Charles Rehwinkel
Sprint-Florida
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Donna McNulty
MCI WorldCom, Inc.
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301-2960

Lisa A. Sapper
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

Floyd Self
Messer Capareello & Self
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301

Marva Brown Johnson
KMC Telecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30034-8119

Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Charles V. Gerkin, Jr.
Allegiance Telecom, Inc.
9201 North Central Expressway
Dallas, TX 75231

Terry Larkin
Allegiance Telecom Inc.
700 East Butterfield Road
Lombard, IL 60148

Matthew Feil
Scott A. Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801

Norman H. Horton, Jr.
Messer Capareello & Self
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301

Jake E. Jennings
NewSouth Comm. Corp.
NewSouth Center
Two N. Main Center
Greenville, SC 29601

Jon C. Moyle, Jr.
Moyle Flanigan Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

Jorge Cruz-Bustillo
Supra Telecommunications and Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133

Jonathan Audu
Supra Telecommunications and Information Systems, Inc.
1311 Executive Center Drive, Suite 220
Tallahassee, FL 32301-5027

Bo Russell
Nuvox Communications Inc.
301 North Main Street
Greenville, SC 29601

Thomas M. Koutsky
Z-Tel Communications, Inc.
1200 19th Street, N.W.
Suite 500
Washington, DC 20036

Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400

J. Jeffry Wahlen
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301

Richard A. Chapkis

Richard A. Chapkis