

ORIGINAL



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February 17, 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
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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 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 813-483-1256.

Sincerely,

Richard A. Chapkis

Richard A. Chapkis

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Enclosures

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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 17, 2004

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 individuals:

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

David S. Mendel, Esq.
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037-1420
Telephone: 202-663-6000
Fax: 202-663-6363

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

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FPSC-COMMISSION CLERK

4. Verizon seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of Verizon for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 030851-TP:

David S. Mendel, 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 Mr. Mendel 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. Mendel possesses the necessary qualifications to responsibly represent Verizon's interests in this matter. In this regard, Mr. Mendel's qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Mendel's affidavit, he: (i) is an attorney admitted to practice in the State of New York 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.

8. Consistent with the standard set forth in Rule 28-106.107, Mr. Mendel 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. Mendel be permitted to appear as a qualified representative on behalf of Verizon Florida Inc.

Respectfully submitted on February 17, 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 DAVID S. MENDEL

I, David S. Mendel, being first duly sworn, do hereby depose and state as follows:

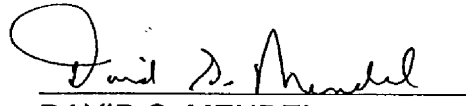
1. I am a counsel at Wilmer Cutler Pickering LLC, outside Counsel for Verizon Florida Inc. in the above-captioned case.

2. I am a member in good standing of the bars of the State of New York 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 assisted other attorneys in other 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.


DAVID S. MENDEL

The foregoing instrument was acknowledged before me this 12th day of February, 2004, by David S. Mendel.


NOTARY PUBLIC

DARLENE BROWN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires: ~~My Commission Expires January 1, 2009~~

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 17, 2004 to:

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

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Tallahassee, FL 32301-1556

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

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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

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Miami, FL 33133

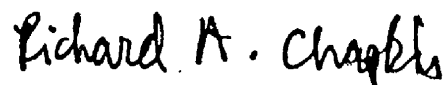
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Richard A. Chapkis