

September 29, 2004

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

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Dear Ms. Bayó:

Enclosed please find the original request of Bright House Networks Information Services, LLC (Florida) ("BHN") to name Christopher W. Savage and Danielle Frappier, attorneys with the law firm Cole, Raywid & Braverman, LLP, qualified representatives of BHN in the complaint against Verizon being filed today, simultaneously with this request. Attached to the request are the sworn affidavits of Mr. Savage and Ms. Frappier setting forth their qualifications.

I thank you in advance for your assistance, and should you have any questions or need any additional information regarding the above, please do not hesitate to contact me.

Sincerely ()

Arthur Orduña Bright House Networks Information Services, LLC (Florida) 5000 Campuswood Drive East Syracuse, NY 13057 Tel: (315) 438-4620

> DOCUMENT NUMBER DATE 10555 SEP 30 3 FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

In re: Request to Name Qualified Representatives

No._____

REQUEST TO NAME QUALIFIED REPRESENTATIVES OF BRIGHT HOUSE NETWORKS INFORMATION SERVICES, LLC (FLORIDA)

Bright House Networks Information Services, LLC (Florida) ("BHN") respectfully requests that the Commission name Christopher W. Savage, a partner of, and Danielle Frappier, an attorney with the law firm Cole, Raywid & Braverman, LLP, qualified representatives of BHN in the complaint against Verizon being filed today with the Commission by BHN.

Mr. Savage's and Ms. Frappier's offices are located at 1919 Pennsylvania Avenue NW, Suite 200, Washington, D.C. 20006, and their telephone number is (202) 659-9750. BHN is aware of the services that Mr. Savage and Ms. Frappier can provide and that BHN could be represented by counsel as noted in FLA. ADMIN. CODE 28-106.106, and BHN has chosen otherwise. Consistent with this rule, BHN has attached hereto sworn affidavits setting forth Mr. Savage's and Ms. Frappier's qualifications.

Respectfully submitted,

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Arthur Orduña Bright House Networks Information Services, LLC (Florida) 5000 Campuswood Drive East Syracuse, NY 13057 Tel: (315) 438-4620

September 29, 2004

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AFFIDAVIT OF CHRISTOPHER W. SAVAGE

WASHINGTON, D.C.

I, Christopher W. Savage, being duly sworn, do hereby depose and state as follows:

1. I am a partner of the law firm Cole, Raywid & Braverman, LLP, 1919 Pennsylvania Avenue NW, Suite 200, Washington, D.C. 20006.

2. I am a member in good standing of the District of Columbia Bar and the State Bar of California, and am seeking to be designated as a qualified representative pursuant to FLA. ADMIN. CODE § 28-106.106.

3. I have represented Bright House Networks Information Services, LLC (Florida) ("BHN") with respect to telecommunications and Internet related regulatory issues for some time, and have provided counsel to BHN on various state and federal regulatory matters. I have previously represented other clients in proceedings before this Commission. I also have extensive experience in representing clients before other state commissions, the Federal Communications Commission and in federal courts, in proceedings involving the examination and resolution of complex telecommunications regulatory matters, including matters factually and legally similar to those at issue in the complaint being filed by BHN against Verizon.

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, and of the standards of conduct for qualified representatives found at FLA. ADMIN. CODE § 28-106.107.

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

Christopher W. Savage

SWORN TO AND SUBSCRIBED before me this _____ day of

September, 2004, by Christopher W. Savage, who personally appeared before me.

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AFFIDAVIT OF DANIELLE FRAPPIER

WASHINGTON, D.C.

I, Danielle Frappier, being duly sworn, do hereby depose and state as follows:

1. I am an attorney with the law firm Cole, Raywid & Braverman, LLP, 1919 Pennsylvania Avenue NW, Suite 200, Washington, D.C. 20006.

2. I am a member in good standing of the District of Columbia Bar and the Maryland State Bar Association, and am seeking to be designated as a qualified representative pursuant to FLA. ADMIN. CODE § 28-106.106. I will be working under the supervision of Christopher W. Savage, who is also seeking designation as a qualified representative in this matter.

3. I have provided counsel to Bright House Networks Information Services, LLC (Florida) ("BHN") in on various state and federal regulatory matters. I also have substantial experience in representing other clients in matters involving the examination and resolution of factually and legally similar matters to those at issue in the complaint being filed by BHN against Verizon.

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, and of the standards of conduct for qualified representatives found at FLA. ADMIN. CODE § 28-106.107.

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

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Danielle Frappier

SWORN TO AND SUBSCRIBED before me this _____ day of

September, 2004, by Danielle Frappier, who personally appeared before me.

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