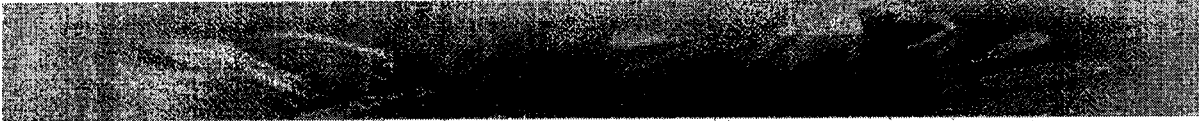


Ruth Nettles

From: terry.scobie@verizon.com
Sent: Thursday, December 06, 2007 2:32 PM
To: Filings@psc.state.fl.us
Cc: Beth Keating; chrissavage@dwt.com; David Christian; de.oroark@verizon.com; demetria.g.clark@verizon.com; frank.app@verizon.com; joan.gage@verizon.com; Patrick Wiggins
Subject: Docket 070691-TP - VZ Florida's Motion to Dismiss Complaint and Request for Oral Argument
Attachments: 070691 VZ FL Request for Oral Argument 12-6-07.pdf; 070691 VZ FL Motion to Dismiss 12-6-07.pdf



The attached filings are submitted in Docket No. 070691-TP on behalf of Verizon Florida LLC by

Dulaney L. O'Roark
P. O. Box 110, MC FLTC0007
Tampa, Florida 33601
(813) 483-1256
de.oroark@verizon.com

The attached Motion to Dismiss Complaint or, in the Alternative, Stay Proceedings consists of 20 pages (cover letter-1 page, Motion-18 pages, and Certificate of Service-1 page). The Request for Oral Argument consists of 3 pages (cover letter-1 page, Request-1 page and Certificate of Service-1 page).

Terry Scobie
Executive Adm. Assistant
Verizon Legal Department
813-483-2610 (tel)
813-204-8870 (fax)
terry.scobie@verizon.com

Motion
DOCUMENT NUMBER - DATE
10747 DEC-6 07
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O. A.
DOCUMENT NUMBER - DATE
10746 DEC-6 07
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Dulaney L. O'Roark III
Vice President & General Counsel, Southeast Region
Legal Department



5055 North Point Parkway
Alpharetta, Georgia 30022

Phone 678-259-1449
Fax 678-259-1589
de.oroark@verizon.com

December 6, 2007 – **VIA ELECTRONIC MAIL**

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: *Docket No. 070691-TP*
Complaint and request for emergency relief against Verizon Florida LLC for
anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and
364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright
House Networks Information Services (Florida), LLC and its affiliate, Bright
House Networks, LLC

Dear Ms. Cole:

Enclosed for filing in the above-referenced matter is Verizon Florida LLC's Request for Oral Argument. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (678) 259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

tas

Enclosures

DOCUMENT NUMBER-DATE

10746 DEC-6 5

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and request for emergency relief) Docket No. 070691-TP
against Verizon Florida LLC for anticompetitive) Filed: December 6, 2007
behavior in violation of Sections 364.01(4), 364.3381,)
and 364.10, F.S., and for failure to facilitate transfer)
of customers' numbers to Bright House Networks)
Information Services (Florida), LLC and its affiliate,)
Bright House Networks, LLC)
-----)

VERIZON FLORIDA LLC'S REQUEST FOR ORAL ARGUMENT

Pursuant to Rule 25-22.0022, Verizon Florida LLC ("Verizon") requests that the Commission hear oral argument on Verizon's Motion to Dismiss Complaint or, in the Alternative, Stay Proceedings. Verizon respectfully submits that oral argument would help the Commission in developing a complete understanding of how Florida law concerning retention marketing applies to facilities-based competition. Oral argument also would assist the Commission in determining whether a stay is appropriate in light of Bright House's parallel challenge to Verizon's retention marketing program at the FCC.

Verizon has conferred with counsel for Bright House and has been informed that Bright House does not object to oral argument on Verizon's motion.

Respectfully submitted on December 6, 2007.

By: s/ Dulaney L. O'Roark III
Dulaney L. O'Roark III
5055 North Point Parkway
Alpharetta, Georgia 30022
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Email: de.oroark@verizon.com

Attorney for Verizon Florida LLC

DOCUMENT NUMBER-DATE

10746 DEC-6 5

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and U. S. mail on December 6, 2007 to:

Patrick Wiggins, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
pwiggins@psc.state.fl.us

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s/ Dulaney L. O'Roark III