

Ruth Nettles

From: terry.scobie@verizon.com
Sent: Thursday, April 17, 2008 4:01 PM
To: Filings@psc.state.fl.us
Cc: Beth Keating; carolyn.ridley@twtelecom.com; chrissavage@dwt.com; David Christian; dkonuch@fcta.com; de.oroark@verizon.com; demetria.g.clark@verizon.com; frank.app@verizon.com; gene@penningtonlaw.com; joan.gage@verizon.com; marva.johnson@bhnis.com; Beth Salak; Charlene Poblete; Chris McDonald; fself@lawfla.com; jctaylor@carrallison.com; Rick Mann; samuel_cullari@comcast.com; bgraham@carrallison.com
Subject: Consolidated Docket Nos. 070691-TP/080036-TP - Verizon Florida LLC's Motion for Reconsideration and Request for Oral Argument
Attachments: 070691 080036 VZ FL Request for oral argument 4-17-08.pdf; 070691 080036 VZ FL Motion for Recon 4-17-08.pdf
3067-08 *3068-08*



The attached filings are submitted in Docket Nos. 070691-TP/080036-TP on behalf of Verizon Florida LLC by

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Document 1 consists of a total of 4 pages (cover letter-1 page, Request for Oral Argument-1 page, and Certificate of Service-2 pages). Document 2 consists of a total of 27 pages (cover letter-1 page, Motion for Reconsideration-24 pages, and Certificate of Service-2 pages).

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DOCUMENT NUMBER-DATE

03067 APR 17 08

FPSC-COMMISSION CLERK

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April 17, 2008 – **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

Docket No. 080036-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
Comcast Phone of Florida, LLC d/b/a Comcast Digital Phone

Dear Ms. Cole:

Enclosed for filing in the above-referenced matters 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

03067 APR 17 08

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: April 17, 2008
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)

-----)
In re: Complaint and request for emergency relief) Docket No. 080036-TP
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 Comcast Phone)
of Florida, LLC d/b/a Comcast Digital Phone)
-----)

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 for Reconsideration. Verizon respectfully submits that oral argument would help the Commission to assess the impact on this case of the Recommended Decision issued by the FCC's Enforcement Bureau on April 11, 2008, in which it concluded that Verizon's retention marketing program does not violate section 222 of the Communications Act of 1934, as amended.

In accordance with Rule 28-106.204(3), counsel for Verizon has conferred with counsel for Bright House and Comcast and has been informed that both parties object to this request.

Respectfully submitted on April 17, 2008.

By: s/ Dulaney L. O'Roark III
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Attorney for Verizon Florida LLC

DOCUMENT NUMBER-DATE

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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 April 17, 2008 to:

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