

Diamond Williams

110056-TP

From: Keating, Beth [BKeating@gunster.com]
Sent: Friday, June 17, 2011 10:37 AM
To: Filings@psc.state.fl.us
Cc: Adam Teitzman; Martha Brown; Beth Salak; David Christian; 'O'Roark, Dulaney L'; 'Johnson, Marva B.'; 'Savage, Christopher'; Kimberly Caswell
Subject: Docket No. 110056-TP
Attachments: 20110617103209627.pdf

Attached is an electronic filing for the docket referenced below. If you have any questions, please contact me at the number below. Thank you.

Person Responsible for Filing:

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Docket Name and Number: Docket No. 110056-TP – Complaint against Verizon Florida LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC

Filed on Behalf of: Bright House Networks Information Services (Florida), LLC

Total Number of Pages: 6

Description of Documents: Request for Naming of Christopher W. Savage as Qualified Representative



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FLORIDA'S LAW FIRM FOR BUSINESS

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DOCUMENT NUMBER-DATE

04180 JUN 17 =

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GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

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June 17, 2011

VIA E-MAIL FILINGS@PSC.STATE.FL.US

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

Re: Docket No. 110056-TP: In re: Complaint against Verizon Florida, LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC.

Dear Ms. Cole:

Attached for electronic filing, please find the Request for Naming of Christopher W. Savage as Qualified Representative, filed today on behalf of Bright House Networks Information Services (Florida), LLC.

Thank you for your assistance with this filing. Please don't hesitate to contact me if you have any questions.

Kind regards,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
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Tallahassee, FL 32301
(850) 521-1706

MEK

DOCUMENT NUMBER - DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint against Verizon Florida, LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC.

Docket No. 110056-TP

Filed: June 17, 2011

REQUEST FOR NAMING OF CHRISTOPHER W. SAVAGE AS QUALIFIED REPRESENTATIVE

Pursuant to Rule 28-106.106, Florida Administrative Code, Bright House Networks Information Services (Florida), LLC, ("Bright House") respectfully requests that the Prehearing Officer enter an Order approving Christopher W. Savage, Esquire, a partner with the law firm of Davis Wright Tremaine, LLP, as a qualified representative authorized to appear on behalf of Bright House in the above-styled Docket before the Florida Public Service Commission. In accordance with the referenced Rule, Bright House affirms that it is aware of its right to be represented by counsel that is a member of the Florida Bar, and that it is fully cognizant of the services that Mr. Savage can provide. Bright House has retained local counsel to appear as co-counsel with Mr. Savage in this proceeding.

Attached hereto is the sworn Affidavit of Christopher W. Savage setting forth Mr. Savage's qualifications as required by Rule 28-106.106, Florida Administrative Code. Mr. Savage's address is:

Christopher W. Savage
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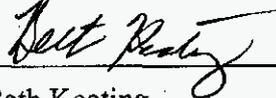
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Docket No. 110056-TP
June 17, 2011

For all the foregoing reasons, Bright House respectfully requests that its Request for Qualified Representative Status be granted.

Respectfully submitted this 17th day of June,
2011,

Bright House Networks Information Services
(Florida), LLC

By: 

Beth Keating
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*Attorneys for Bright House Networks
Information Services (Florida), LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or U.S. Mail this 17th day of June, 2011.

Adam Teitzman
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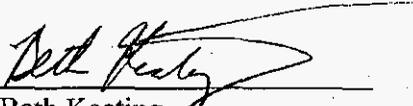
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint against Verizon Florida, LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC.

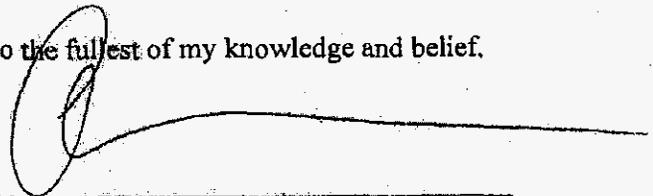
Docket No. 110056-TP

AFFIDAVIT OF CHRISTOPHER W. SAVAGE

District of Columbia

I, CHRISTOPHER W. SAVAGE, being duly sworn, do hereby affirm and attest as follows:

1. I am an attorney and partner with the national law firm of Davis, Wright, Tremaine, LLP, and have been retained as counsel for Bright house Networks Information Services (Florida), LLC ("Bright House").
2. I am a member of good standing of the Bar of the District of Columbia, as well as the California Bar, and as seeking qualified representative status to appear on behalf of Bright House before the Florida Public Service Commission.
3. I have an extensive background in commercial, regulatory, cable, Internet and telecommunications-specific litigation and have appeared in matter before numerous federal and state courts, as well as state utility regulatory bodies, including the Florida Public Service Commission.
4. I am familiar with Florida Statutes and the Florida Administrative Code, as well as Florida practice rules.
5. The foregoing statements are true and correct to the fullest of my knowledge and belief.



Christopher W. Savage, Esquire

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BEFORE ME, the undersigned authority, personally appeared Christopher W. Savage, who is personally known to me ~~or has produced~~ _____ as ~~identification~~ and did execute the foregoing.

SWORN TO AND SUBSCRIBED before me this 17th day of June, 2011.


Notary Public

Nichele Y. Rice
Notary Public, District of Columbia
My Commission Expires 8/30/2015

Typed, Printed, or Stamped Name
My Commission Expires: _____