## **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

January 12, 2009 – VIA ELECTRONIC MAIL

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

Re: Docket No. 080701-TP

Emergency complaint and petition requesting initiation of show cause proceedings against Verizon Florida LLC for alleged violation of Rules 25-4.036 and 25-4.038, Florida Administrative Code, by Bright House Networks Information Services (Florida) LLC and 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

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**Enclosures** 

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Emergency complaint and petition requesting ) initiation of show cause proceedings against Verizon ) Florida LLC for alleged violation of Rules 25-4.036 ) And 25-4.038, Florida Administrative Code, by Bright ) House Networks Information Services (Florida) LLC ) and Bright House Networks, LLC

Docket No. 080701-TP Filed: January 12, 2009

## 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 and Petition or in the Alternative for Summary Final Order. Verizon respectfully submits that oral argument would help the Commission because Verizon's motion involves technical discussion of the unregulated facilities involved in this case, as well as legal analysis concerning the Commission's jurisdiction, rules and standing principles.

Respectfully submitted on January 12, 2009.

By: <u>s/ Dulaney L. O'Roark III</u> Dulaney L. O'Roark III

P. O. Box 110, 37<sup>th</sup> Floor

MC FLTC0007

Tampa, Florida 33601-0110 Phone: (678) 259-1449

Fax: (678) 259-1589

email: de.oroark@verizon.com

Attorney for Verizon Florida LLC

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and U.S. mail on January 12, 2009 to:

Charles Murphy, Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 cmurphy@psc.state.fl.us

Beth Keating
Akerman Senterfitt

106 East College Avenue, Suite 1200
Tallahassee, FL 32301
beth.keating@akerman.com

Marva Brown Johnson Bright House Networks 12985 North Telecom Parkway Temple Terrace, FL 33637-0907 marva.johnson@bhnis.com

s/ Dulaney L. O'Roark III