

Ruth Nettles


090538-TP

From: Freedman, Maggie [Maggie.Freedman@ruden.com] on behalf of Smallwood, Mary [Mary.Smallwood@ruden.com]
Sent: Monday, March 15, 2010 3:43 PM
To: Filings@psc.state.fl.us
Cc: Adam L. Scherr; Allen Zorachi, Esq.; Andrew M. Klein, Esq.; Beth Keating; Beth Salak; Carolyn Ridley; David Christian; Dulaney O'Roarke, Esq.; Granite Telecommunications; Gregg Strumberger; Gregory Diamond, Esq.; Jason Topp; John Ivanuska; Ken Culpepper; Marsha E. Rule, Esq.; Matthew Feil; Lee Eng Tan
Subject: Docket No. 090538-TP - Request of Qwest Communications Company, LLC to Be Represented By Adam L. Sherr and Jason D. Topp As Qualified Representatives
Attachments: Qwest3-15-10.pdf

In Docket No. 090538-TP, Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES), XO COMMUNICATIONS SERVICES, INC., TW TELECOM OF FLORIDA, L.P., GRANITE TELECOMMUNICATIONS, LLC, COX FLORIDA TELCOM, L.P., BROADWING COMMUNICATIONS, LLC, AND JOHN DOES 1 THROUGH 50, For unlawful discrimination.

Eight (8) pages filed on behalf of Qwest Communications Company, LLC by Mary F. Smallwood, Ruden McClosky P.A., 215 S. Monroe Street, Suite 815, Tallahassee, FL 32301, (850) 412-2004, (850) 412-1304 facsimile, Mary.Smallwood@Ruden.com.

Maggie Freedman
 Legal Secretary



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*Done
 3/16/10
 MW*

DOCUMENT NUMBER-DATE

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3/15/2010

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES), XO COMMUNICATIONS SERVICES, INC., TW TELECOM OF FLORIDA, L.P., GRANITE TELECOMMUNICATIONS, LLC, COX FLORIDA TELCOM, L.P., BROADWING COMMUNICATIONS, LLC, AND JOHN DOES 1 THROUGH 50,
For unlawful discrimination.

Docket No. 090538-TP

Filed: March 15, 2010

**REQUEST OF QWEST COMMUNICATIONS COMPANY, LLC
TO BE REPRESENTED BY ADAM L. SHERR AND JASON D. TOPP
AS QUALIFIED REPRESENTATIVES**

Pursuant to Rule 28-106.106 of the Florida Administrative Code, Qwest Communications Company, LLC ("QCC") hereby files this Request to grant the following attorneys Qualified Representative status to appear in the captioned proceeding: Adam L. Sherr and Jason D. Topp (collectively, the "Attorneys"). QCC is fully aware of the services which the Attorneys can provide and is aware that QCC can be represented by counsel of the Florida Bar as defined in Rule 28-106.106. QCC is being represented in this proceeding by Florida Counsel, but also chooses to be represented by the following attorneys who are members of the Bars of Washington and Minnesota, respectively. The contact information for the Attorneys is as follows:

Adam L. Sherr
Associate General Counsel
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Jason D. Topp
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Qwest Communications Company, LLC
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E-mail: Jason.Topp@qwest.com

RM:7223368:1

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(1) In accordance with Rule 28-106.106, QCC provides the following information with respect to the Attorneys:

Mr. Sherr is a member in good standing with the Washington State Bar Association (Bar No. 25291) and admitted to practice before the State and Federal Courts in Washington. Mr. Topp is a member in good standing with the Minnesota State Bar (Attorney No. 0232166) and admitted to practice before the State of Minnesota, Federal District Court of Minnesota; Eighth Circuit Court of Appeals. Each is experienced in the matters involved in public utility regulation and has practiced before agencies engaged in such regulation as reflected in the attached certifications.

(2) Neither Mr. Sherr nor Mr. Topp has been disciplined in any manner nor has any pending disciplinary proceeding.

(3) See the attached sworn affidavits of Mr. Sherr and Mr. Topp, stating that each is in good standing of the Bars in which they are admitted; experienced in the matters involved in public utility regulation; has practiced extensively before agencies in such regulation; has knowledge of the Florida Statutes relative to the Commission's jurisdiction; has knowledge of the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; has knowledge of the Florida Administrative Code and Florida Statutes relative to the Rules of Evidence, including the concept of hearsay in an administrative proceeding; has acquired and will acquire further knowledge of the factual and legal issues involved in this proceeding; and has knowledge of and complied with the Standards of Conduct for Qualified Representatives, Rule 28-106.107 of the Florida Administrative Code.

WHEREFORE, Qwest Communications Company, LLC requests that the Commission grant this request.

Respectfully submitted this 15th day of March, 2010.

Mary F. Smallwood

Mary F. Smallwood
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215 S. Monroe St.
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Telephone: (850) 412-2000
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**CERTIFICATE OF SERVICE
DOCKET NO. 090538-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by regular U.S. Mail and electronic mail on this 5th day of March, 2010, to the following:

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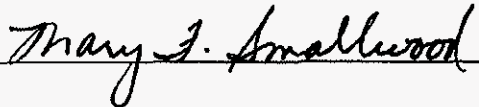
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**Florida Public Service Commission
Division of Competitive Markets and Enforcement**

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Florida Public Service Commission
General Counsel's Office
Theresa Tan, Esquire
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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES), XO COMMUNICATIONS SERVICES, INC., TW TELECOM OF FLORIDA, L.P., GRANITE TELECOMMUNICATIONS, LLC, COX FLORIDA TELCOM, L.P., BROADWING COMMUNICATIONS, LLC, AND JOHN DOES 1 THROUGH 50,
For unlawful discrimination.

Docket No. 090538-TP

Filed: March 15, 2010

AFFIDAVIT OF ADAM L. SHERR

I, Adam L. Sherr, hereby certify, pursuant to Rule 28-106.106 of the Florida Administrative Code, that I am an attorney in good standing of the Bar of the State of Washington (Bar No. 25291, Washington State Bar Association); that I am experienced in the matters involved in public utility regulation; that I have practiced extensively before agencies engaged in such regulation; that I have knowledge of the Florida Statutes relative to the Commission's jurisdiction; that I have knowledge of the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; that I have knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; that I have acquired and will further acquire knowledge of the factual and legal issues involved in this proceeding; and that I have knowledge of and have complied with the Standards of Conduct for Qualified Representatives, Rule 28-106.107 of the Florida Administrative Code.



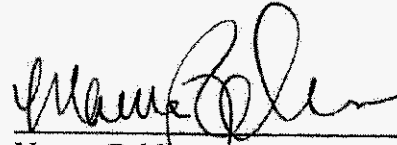
Adam L. Sherr
Washington State Bar Association
Attorney Bar No. 25291

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Affirmed and subscribed before me this 12th day of March, 2010.



Notary Public
Maura E. Peterson

My Commission Expires: 2/14/2014



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

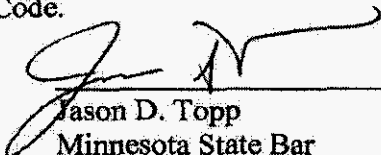
Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against MCIMETRO ACCESS TRANSMISSION SERVICES, LLC (D/B/A VERIZON ACCESS TRANSMISSION SERVICES), XO COMMUNICATIONS SERVICES, INC., TW TELECOM OF FLORIDA, L.P., GRANITE TELECOMMUNICATIONS, LLC, COX FLORIDA TELCOM, L.P., BROADWING COMMUNICATIONS, LLC, AND JOHN DOES 1 THROUGH 50,
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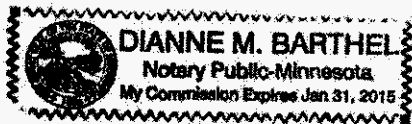
AFFIDAVIT OF JASON D. TOPP

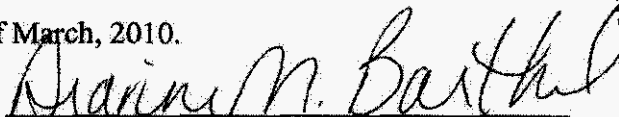
I, Jason D. Topp, hereby certify, pursuant to Rule 28-106.106 of the Florida Administrative Code, that I am an attorney in good standing of the Minnesota State Bar; that I am experienced in the matters involved in public utility regulation; that I have practiced extensively before agencies engaged in such regulation; that I have knowledge of the Florida Statutes relative to the Commission's jurisdiction; that I have knowledge of the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; that I have knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; that I have acquired and will further acquire knowledge of the factual and legal issues involved in this proceeding; and that I have knowledge of and have complied with the Standards of Conduct for Qualified Representatives, Rule 28-106.107 of the Florida Administrative Code.



Jason D. Topp
Minnesota State Bar
Attorney No. 0232166

Affirmed and subscribed before me this 15th day of March, 2010.





Notary Public
My Commission Expires: Jan 31, 2015

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