Eric Fryson

From:	Scobie, Teresa A (TERRY) [terry.scobie@verizon.com]
Sent:	Wednesday, September 26, 2012 11:38 AM
То:	Filings@psc.state.fl.us
Cc:	Adam Sherr; Alan Gold; Allen Zoracki; Andrew Klein; Beth Keating; Carolyn Ridley; O'Roark, Dulaney L; Edward Krachmer; Eric Branfman; Jane Whang; John Greive; Marsha Rule; Matthew Feil; Michael McAlister; Michael Shortley; Philip Macres; richard.brown@accesspointinc.com; Severy, Richard; Susan Masterton; Lee Eng Tan
Subject:	Docket No. 090538-TP - Verizon's Request for Qualified Representative Status - Richard Severy
Attachments	: 090538 VZ Req for Qual Rep-Severy.pdf

The attached is submitted for filing on behalf of Verizon Access Transmission Services by

Dulaney L. O'Roark III 610 E. Zack Street, 5th Floor Tampa, Florida 33602 (678) 259-1657 <u>de.oroark@verizon.com</u>

The attached document consists of a total of 9 pages - cover letter (1 page), Request and Affidavit (5 pages), and Certificate of Service (3 pages).

Terry Scobie Legal Secretary II Verizon Legal Department 610 E. Zack Street, 5th Floor Tampa, Florida 33602 813-483-2610 (tel) 813-204-8870 (fax) terry.scobie@verizon.com

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DOCUMENT NUMBER-DATE 06455 SEP 26 № FPSC-COMMISSION CLERK Dulaney L. O'Roark III General Counsel-Southern Region Legal Department



5055 North Point Parkway Alpharetta, Georgia 30022

Phone 678-259-1657 Fax 678-259-5326 de.oroark@verizon.com

September 26, 2012 - VIA ELECTRONIC MAIL

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

Docket No. 090538-TP

Amended Complaint of Qwest Communications Company, LLC, Against MCImetro Transmission Services LLC (d/b/a Verizon Access Transmission Services; XO Communications Services, Inc.; tw telecom of florida, I.p.; Granite Telecommunications, LLC; Cox Florida Telcom, L.P.; Broadwing Communications, LLC; Access Point, Inc.; Birch Communications, Inc.; Budget Prepay, Inc.; Bullseye Telecom, Inc.; Deltacom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Lightyear Network Solutions, LLC; Navigator Telecommunications, LLC; Paetec Communications, Inc.; STS Telecom, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, for unlawful discrimination

Dear Ms. Cole:

Enclosed for filing in the above matter is Verizon's Request for Qualified Representative Status for Richard Severy. If there are any questions regarding this filing, please contact me at 678-259-1657.

Sincerely,

s/Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

BOOLMENT NUMBER-DATE

06455 SEP 26 ≌

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Amended 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, I.p.; Granite Telecommunications, LLC; Cox Florida Telcom, L.P.; Broadwing Communications, LLC; Access Point, Inc.; Birch Communications, Inc.; Budget Prepay, Inc.; Bullseye Telecom, Inc.; Deltacom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Lightyear Network Solutions, LLC; Navigator Telecommunications, LLC; Paetec Communications, Inc.; STS Telecom, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, For unlawful discrimination

Docket No. 090538-TP

Filed: September 26, 2012

REQUEST FOR QUALIFIED REPRESENTATIVE STATUS

Pursuant to Rule 28-106.106, Florida Administrative Code, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (Verizon) requests that Richard Severy, Assistant General Counsel, be named a qualified representative of Verizon in this proceeding. Verizon is aware that it can be represented by counsel that is a member of the Florida Bar and is aware of the services that Mr. Severy can provide.

Attached hereto is a sworn affidavit setting forth Mr. Severy's qualifications. Mr. Severy's business address is 2775 Mitchell Drive, Room 8242, Walnut Creek, California 94598, and his telephone number is (925) 951-2034.

WHEREFORE, Verizon respectfully requests that the Florida Public Service Commission grant this request.

> 0000MENT NUMBER-CATE 06455 SEP 26 ≥ FPSC-COMMISSION CLERK

Respectfully submitted on September 26, 2012.

By: <u>s/ Dulaney L. O'Roark III</u> Dulaney L. O'Roark III 610 E. Zack Street, 5th Floor Tampa, Florida 33602 (678) 259-1657 <u>de.oroark@verizon.com</u>

Attorney for Verizon

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Amended 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; Access Point, Inc.; Birch Communications, Inc.; Budget Prepay, Inc.; Bullseye Telecom, Inc.; Deltacom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Lightyear Network Solutions, LLC; Navigator Telecommunications, LLC; Paetec Communications, Inc.; STS Telecom, LLC; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, For unlawful discrimination

Docket No. 090538-TP

AFFIDAVIT OF RICHARD SEVERY

I, Richard Severy, being first duly sworn, state that:

1. I am currently employed by Verizon Corporate Resources Group LLC and provide legal support to MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services ("Verizon") as Assistant General Counsel. My business address is 2775 Mitchell Drive, Room 8242, Walnut Creek, California 94598, and my telephone number is (925) 951-2034.

2. I possess the necessary qualifications to responsibly represent Verizon's interests in the above-referenced docket before the Florida Public Service Commission.

3. I am an attorney admitted to practice and a member in good standing of the State Bar of California (Member No. 67490). I have practiced extensively before other state and federal utility regulatory agencies and authorities. I have knowledge of the Florida Statutes relating to the Commission's jurisdiction. I have knowledge of the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding. I also have knowledge of the Florida Administrative Code and Florida Statutes relating to the rules of evidence, including the concept of hearsay in an administrative proceeding. I have acquired or will acquire knowledge of the factual and legal issues in these matters and have knowledge of and am in compliance with the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107, Florida Administrative Code.

Richard Severy Assistant General Counsel Verizon 2775 Mitchell Drive, Room 8242 Walnut Creek, CA 94598 (925) 951-2034 richard.b.severy@verizon.com

STATE OF CALIFORNIA)) ss. COUNTY OF CONTRA COSTA)

Subscribed and sworn to before me this 24th day of September, 2012.

Notary Public, State of California

My Commission Expires: 9/3/2014

SEE ATTACHED NOTARY DOCUMENT

CALIFORNIA JURAT WITH A	FFIANT	STATEMENT
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GOVERNMENT CODE § 8202

	ompleted only by document signer[s], <i>not</i> Notary)
Affidant of Richard	Severy
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3	
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6 Signeture of Document Signer No. 1	Signature of Document Signer No. 2 (if any)
. /	
State of California County of <u>Contra</u> Coster	Subscribed and swom to (or affirmed) before me
County of <u>CONTRA</u>	on this <u>24H</u> day of <u>September</u> , 2012 Data Vear
	(1) Richard Bruce Severy
	proved to me on the basis of satisfactory evidence
KAREN MCINNIS	to be the person who appeared before me (.) (.) (and
Commission # 1902565 Notary Public - California	(2)Neme of Signer
Contra Costa County My Comm. Expires Sep 3, 2014	proved to me on the basis of satisfactory evidence
	to be the person who appeared before me.)
Place Notary Seal Above	Signature KUUL KUL
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@ 2010 National Notary Association • NationalNotary.org • 1-800-US NOTARY (1-800-876-6827)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail(*) and/or U.S. mail(**) on September 26, 2012 to:

Theresa Tan, Staff Counsel(*) Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>Itan@psc.state.fl.us</u>

Broadwing Communications, LLC(*) Marsha E. Rule Rutledge, Ecenia & Purnell, P.A. 119 South Monroe Street, Suite 202 Tallahassee, FL 32301 <u>marsha@reuphlaw.com</u>

CenturyLink(*) Susan S. Masterton 315 S. Calhoun Street, Suite 500 Tallahassee, FL 32301 susan.masterton@centurylink.com

Granite Communications, LLC(*) BullsEye Telecom, Inc. Andrew M. Klein Allen C. Zoracki Klein Law Group, PLLC 1250 Connecticut Avenue, NW, Suite 200 Washington, DC 20036 <u>aklein@kleinlawpllc.com</u> <u>azoracki@kleinlawpllc.com</u>

> Qwest (Seattle)(*) Adam L. Sherr 1600 7th Avenue, Room 1506 Seattle, WA 98191 Adam.Sherr@gwest.com

TW Telecom of Florida L.P.(*) Carolyn Ridley 2078 Quail Run Drive Bowling Green, KY 42104 Carolyn.Ridley@twtelecom.com TW Telecom of Florida, L.P.(*) XO Communications Services, Inc. Windstream NuVox, Inc. Birch Communications, Inc. DeltaCom, Inc. PAETEC Communications, Inc. US LEC of Florida, LLC d/b/a PAETEC Business Services Matthew J. Feil Gunster Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 618 Tallahassee, FL 32301 <u>mfeil@gunster.com</u>

PAETEC Communications, Inc.(*) US LEC of Florida, LLC d/b/a PAETEC Business Services Edward B. Krachmer Windstream Communications, Inc. 4001 Rodney Parham Road MS 1170-B1F03-53A Little Rock, AR 72212 edward.krachmer@windstream.com

> STS Telecom, LLC(*) Alan C. Gold 1501 Sunset Drive, 2nd Floor Coral Gables, FL 33143 agold@acgoldlaw.com

XO Communications Services, Inc.(*) Jane Whang David Wright Tremain 505 Montgomery Street, Suite 800 San Francisco, CA 94111-6533 janewhang@dwt.com

Access Point, Inc.(*) Lightyear Network Solutions, LLC Navigator Telecommunications, LLC Eric J. Branfman Philip J. Macres Bingham McCuthen, LLP 2020 K Street NW Washington, DC 20006-1806 <u>eric.branfman@bingham.com</u> <u>philip.macres@bingham.com</u> Access Point, Inc.(*) Richard Brown Chairman-CEO 1100 Crescent Green, Suite 109 Cary, NC 27518-8105 richard.brown@accesspointinc.com

Budget Prepay, Inc.(**) General Counsel 1325 Barksdale Blvd., Suite 200 Bossier City, LA 71111

Ernest Communications, Inc.(**) General Counsel 5275 Triangle Parkway, Suite 150 Norcross, GA 30092

Flatel, Inc.(**) c/o Adriana Solar 2300 Palm Beach Lakes Blvd. Executive Center, Suite 100 West Palm Beach, FL 33409

Lightyear Network Solutions, Inc.(*) John Greive VP-Regulatory Affairs & General Counsel 1901 Eastpoint Parkway Louisville, KY 40223 john.greive@lightyear.net

Navigator Telecommunications, LLC(*) Michael McAlister General Counsel 8525 Riverwood Park Drive P. O. Box 13860 North Little Rock, AR 72113 <u>mike@navtel.com</u>

> Level 3 Communications Michael J. Shortley III Vice President-Legal 225 Kenneth Drive Rochester, NY 14623 <u>michael.shortley@level3.com</u>

> > s/ Dulaney L. O'Roark III