

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of DIECA Communications,
Inc., d/b/a Covad Communications Company
Against BellSouth Telecommunications, Inc.
For Breach of the Parties' Interconnection
Agreement and Unauthorized Discontinuance
Of Service to Customers, Request for
Maintenance of the Status Quo, and Request
For Expedited Relief.

Docket No: 030945-JP

Filed: September 26, 2003

**REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE,
CHARLES E. WATKINS**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), through its undersigned counsel, submits its Request for Representation by a Qualified Representative, Charles E. Watkins pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. Covad is a certified telecommunications carrier authorized to provide telecommunications services in the state of Florida. Covad is located at 1230 Peachtree Street, N.E., 19th Floor, Atlanta, Georgia 30309.

2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request for Representation should be served upon the following individual:

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Kaufman & Arnold, P.A.
117 South Gadsden
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that Covad submit a written request to the presiding officer in the event that Covad elects to be represented before the Commission by a qualified representative. Covad hereby submits such a request.

4. Covad seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of Covad for any purpose and in all matters or proceedings conducted before the Commission in connection with this docket.

Charles E. Watkins
Covad Communications Co.
1230 Peachtree Street, N.E., 19th Floor
Atlanta, GA 30309
(404) 942-3492 (telephone)
(404) 942-3495 (fax)
gwatkins@covad.com

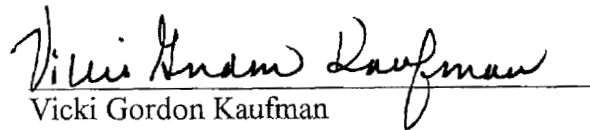
5. Consistent with Rule 28-106.106(2)(b), Covad hereby affirms that it is aware of the services Mr. Watkins can provide and, further, that Covad can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1). Indeed, Covad has elected to be represented in this matter by other attorneys in addition to Mr. Watkins.

6. Covad submits that Mr. Watkins possesses the necessary qualifications to responsibly represent Covad’s interests in this matter. In this regard, Mr. Watkins’ qualifications are set forth in the attached affidavit.

7. As reflected in Mr. Watkins’ affidavit, attached as “Attachment A,” he: (i) is an attorney admitted to practice in the State of Georgia; (ii) has reviewed those portions of the Florida Statutes relative to the Commission’s jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding.

8. Consistent with the standard set forth in Rule 28-106.107, Mr. Watkins has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Covad is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, Covad requests that Mr. Watkins be permitted to appear as a qualified representative on behalf of Covad.

A handwritten signature in black ink, reading "Vicki Gordon Kaufman", is written over a horizontal line.

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525
Telecopy: (850) 222-5606

Attorneys for Covad Communications, Inc.

..

Attachment A

Affidavit of Charles E. Watkins

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of DIECA Communications,
Inc., d/b/a Covad Communications Company
Against BellSouth Telecommunications, Inc.
For Breach of the Parties' Interconnection
Agreement and Unauthorized Discontinuance
Of Service to Customers, Request for
Maintenance of the Status Quo, and Request
For Expedited Relief.

Docket No: _____

Filed: September 26, 2003

AFFIDAVIT OF CHARLES E. WATKINS

STATE OF GEORGIA

COUNTY OF FULTON

I, Charles E. Watkins, being first duly sworn, do hereby depose and state as follows:

1. I am Senior Counsel for Covad Communications Company, 1230 Peachtree Street, N.E., 19th Floor, Atlanta, Georgia 30309.

2. I am a member in good standing of the Georgia Bar and am seeking to be designated as a qualified representative in the above-captioned docket pursuant to Rule 28-106.106, Florida Administrative Code.

3. I have served as regulatory counsel to Covad Communications Company in proceedings before state commissions. Moreover, I have assisted other attorneys in proceedings before other state commissions that have involved the examination and resolution of factually and legal issues similar to those under consideration in the above-captioned docket.

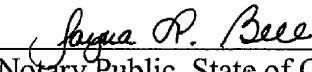
4. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Florida Rules of Evidence.

I declare that the foregoing is true and correct based on my knowledge, information and belief.


CHARLES E. WATKINS

SWORN TO AND SUBSCRIBED before me this 22nd day of September, 2003, by Charles E. Watkins, who is personally know to me.



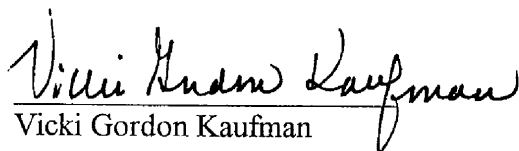

Notary Public, State of Georgia
County of Fulton
Commission Number:
My Commission expires: 3/18/2006

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Representation by a Qualified Representative, Charles E. Watkins has been provided by (*) hand delivery or U.S. Mail this 26th day of September 2003, to the following:

(*) Beth Keating
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

(*) Nancy White
C/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556


Vicki Gordon Kaufman