# **Diamond Williams**

From:	Keating, Beth [BKeating@gunster.com]
Sent:	Tuesday, October 04, 2011 11:15 AM
То:	Filings@psc.state.fl.us
Cc:	O'Roark, Dulaney L; 'david.christian@verizon.com'; Beth Salak; Larry Harris; Martha Brown; Savage, Christopher; 'Dodge, John'; 'Caswell, Kimberly (Kim)'; Adam Teitzman; 'Johnson, Marva B.'
Subject:	Docket No. 110056-TP
Attachments: 20111004110856193.pdf	

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

## Person Responsible for Filing:

**Beth Keating Gunster Law Firm** 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 Direct: 850-521-1706 Main: 850-521-1980 bkeating@gunster.com

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 Qualified Representative Status for John Dodge



INSTER FLORIDA'S LAW FIRM FOR BUSINESS

Beth Keating | Attorney **Governmental Affairs** 215 S. Monroe Street, Suite 601 Tallahassee, FL 32301 P 850-521-1706 C 850-591-9228 gunster.com | View my bio



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DOCUMENT NUMBER-DATE 07204 OCT-4= **FPSC-COMMISSION CLERK** 

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Writer's Direct Dial Number: (850) 521-1706 Writer's E-Mail Address: bkeating@gunster.com

October 4, 2011

### VIA ELECTRONIC MAIL: FILINGS@PSC.STATE.FL.US

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

Re: 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.

Dear Ms. Cole:

Enclosed for electronic filing in the referenced Docket, please find a Request for Qualified Representative Status for John C.Dodge, submitted on behalf of Bright House Networks Information Services (Florida), LLC. Also included is the required affidavit of Mr. Dodge.

As always, please don't hesitate to contact me if you have any questions or concerns. Thank you for your assistance with this filing.

Sincerely,

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 (850) 521-1706

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215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1804 p 850-521-1980 f 850-576-0902 GUNSTER.COM WPB\_ACTIVE 4911530.1 Fort Lauderdale | Jacksonville | Miami | Palm Beach | Stuart | Tallahassee | Vero Beach | West Palm Beach EPSC-COMMISSION OF LY

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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: October 4, 2011

## REQUEST FOR NAMING OF JOHN C. DODGE 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 John C. Dodge, 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. Dodge can provide. Bright House has retained local counsel to appear as co-counsel with Mr.

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

John C. Dodge Davis Wright Tremaine, LLP 1919 Pennsylvania Avenue, NW Suite 800 Washington, D.C. 20006 Tel: 202-973-4200 Fax: 202-973-4499 johndodge@dwt.com

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Docket No. 110056-TP October 4, 2011

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

Respectfully submitted this  $4^{\prime}$  day of October, 2011,

I

Bright House Networks Information Services (Florida), LLC

By:

Beth Keating Fla. Bar No. 0022756 Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 (850) 521-1706 -

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

Christopher W. Savage John C. Dodge Davis Wright Tremaine, LLP 1919 Pennsylvania Avenue, NW Suite 800 Washington, D.C. 20006 Tel: 202-973-4200 Fax: 202-973-4499 chrissavage@dwt.com johndodge@dwt.com Docket No. 110056-TP October 4, 2011

### 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 \_\_\_\_\_ day of October, 2011.

Adam Teitzman Attorney Supervisor Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ateitzma@psc.state.fl.us

Beth Salak Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 bsalak@psc.state.fl.us

Christopher W. Savage Davis, Wright Tremaine, LLP 1919 Pennsylvania Avenue NW, Suite 200 Washington, DC 20006 chrissavage@dwt.com

Marva B. Johnson Bright House Networks 301 E. Pine Street, Suite 600 Orlando, FL 32801 marva.johnson@mybrighthouse.com

Dulaney L. O'Roark III Verizon 5055 North Point Parkway Alpharetta, GA 30022 de.oroark@verizon.com David Christian Verizon Florida, Inc. 106 East College Avenue Tallahassee, FL 32301 David.christian@verizon.com

Martha Brown Senior Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <u>mbrown@psc.state.fl.us</u>

Kimberly Caswell Verizon P. O. Box 110, MC FLTP0007 Tampa, Florida 33601-0110 kimberly.caswell@verizon.com

oTh Kedy

Beth Keating Gunster Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301

# 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 JOHN C. DODGE

### **District of Columbia**

I, JOHN C. DODGE, 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 Maine Bar and the Massachusetts Bar, and am 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.

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Docket No. 110056-TP 10/4\_, 2011

BEFORE ME, the undersigned authority, personally appeared John C. Dodge, who is personally known to me or has produced <u>Drivers</u> <u>License</u> as identification and did execute the foregoing.

SWORN TO AND SUBSCRIBED before me this  $4^{\frac{44}{2}}$  day of October, 2011.

Notary Public

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Gina H. Lee Notary Public, District of Columbia My Commission Expires 06-30- 2014

Typed, Printed, or Stamped Name My Commission Expires: 6/30/2014