

Dallas Denver Fort Lauderdale Jacksonville Los Angeles Madison Miami New York Orlando Tallahassee Tampa Tysons Corner Washington, DC West Palm Beach

**C** 

Suite 1200 106 East College Avenue Tallahassee, FL 32301

www.akerman.com

850 224 9634 tel 850 222 0103 fax

November 3, 2009

#### VIA HAND DELIVERY

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

Re: Petition for Arbitration of Terms and Conditions of An Interconnection Agreement with Verizon Florida, LLC by Bright House Networks Information Services (Florida) LLC

Dear Ms. Cole:

Enclosed for filing, please find the original and seven (7) copies each of Bright House Networks Information Services (Florida) LLC's (Bright House) Request for Qualified Representative Status for Christopher Savage, and its Request for Qualified Representative Status for Danielle Frappier, filed in conjunction with the Company's Petition for Arbitration of an Interconnection Agreement with Verizon Florida, LLC, which is also being filed today under

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FPSC-COMMISSION CLERK

Ms. Ann Cole November 3, 2009 Page 2

have any questions whatsoever.

Sincerely,

Beth Keating

AKERMAN SENTERFITT

106 East College Avenue, Suite 1200

Tallahassee, FL 32302-1877 Phone: (850) 224-9634

Fax: (850) 222-0103

Enclosures

ce: Adam Teitzman (PSC)

Beth Salak (PSC)

In Re Bright House Networks Information	)	Docket No.
Services (Florida), LLC	)	
	)	Filed: November 3, 2009
Petition for Arbitration of Interconnection	)	
Agreement with Verizon Florida, LLC	)	

# BRIGHT HOUSE'S REQUEST FOR QUALIFIED REPRESENTATIVE STATUS

Pursuant to Rule 28-106.106, Florida Administrative Code, Bright House Networks Information Services (Florida), LLC ("Bright House") respectfully requests that Christopher W. Savage, Esquire, partner with the law firm of Davis Wright Tremaine, LLP, be named as a qualified representative authorized to appear on behalf of Bright House before the Florida Public Service Commission for the duration of this proceeding. 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. Savage can provide.

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

Davis Wright Tremaine LLP 1919 Pennsylvania Ave., NW, Suite 200 Washington, D.C. (202) 973-4211

For all the foregoing reasons, Bright House respectfully requests that its Request for

11075 NOV -38

{TL206896;1}

FPSC-COMMISSION CLERK

Petition for Arbitration November 3, 2009

Qualified Representative Status be granted.

Respectfully submitted,

By:

Beth Keating, Esquire Akerman Senterfitt

106 East College Avenue, Suite 1200

P.O. Box 1877 (32302) Tallahassee, Florida 32301

(850) 521-8002

beth.keating@akerman.com

Attorneys for Bright House

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via US Mail or Hand Delivery to the persons listed below this <u>3rd</u> day of November, 2009:

Dulaney L. O'Roark, III, VP/General Counsel	David Christian (Hand Delivery)
Verizon Florida, LLC	Verizon Florida, Inc.
P.O. Box 110, MC FLTC 0007	106 East College Ave.
Tampa, FL 33601	Tallahassee, FL 32301-7748
de.oroark@verizon.com	David.christian@verizon.com
Adam Teitzman, Attorney Supervisor (Hand	Beth Salak, Director/Competitive Markets and
Delivery)	Enforcement (Hand Delivery)
Florida Public Service Commission,	2540 Shumard Oak Blvd.
Office of the General Counsel	Tallahassee, FL 32399-0850
2540 Shumard Oak Blvd.	bsalak@psc.state.fl.us
Tallahassee, FL 32399-0850	
ateitzma@psc.state.fl.us	
7.	

By:

Beth Keating

Akerman Senterfitt

set Heater

106 East College Avenue, Suite 1200

P.O. Box 1877 (32302)

Tallahassee, Florida 32301

(850) 521-8002

Fax: (850) 222-0103

beth.keating@akerman.com

In Re Bright House Networks Information	)	Docket No.
Services (Florida), LLC		Filed: November, 2009
Petition for Arbitration of Interconnection Agreement with Verizon Florida, LLC	)  )	
Agreement with Verizon Florida, LLC	)	

#### AFFIDAVIT OF CHRISTOPHER W. SAVAGE

#### District of Columbia

- I, CHRISTOPHER W. SAVAGE, being first 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 California Bar, and am seeking qualified representative status to appear on behalf of Bright House before the Florida Public Service Commission.
- 3. I have extensive commercial, regulatory, cable, Internet and telecommunications-specific litigation experience and have appeared in matters before numerous federal and state courts, as well as state utility regulatory bodies.
- 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 extent of my knowledge and belief.

Christopher W. Savage, Esquire

BEFORE ME, the undersigned authority, personal personally known by me or who has produce identification and did execute the foregoing.		
SWORN TO AND SUBSCRIBED before me this	October day of November, 2009.	
	Notary Public Standary	
	Carol R. Kaltenbaugh Notary Public, District of Columbia My Commission Expires 9-30-2010	
	Typed, Printed, or Stamped Name My Commission Expires:	

In Re Bright House Networks Information	)	Docket No.
Services (Florida), LLC	)	/ 0.000
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Petition for Arbitration of Interconnection	)	
Agreement with Verizon Florida, LLC	)	
	,	

# BRIGHT HOUSE'S REQUEST FOR QUALIFIED REPRESENTATIVE STATUS

Pursuant to Rule 28-106.106, Florida Administrative Code, Bright House Networks Information Services (Florida), LLC ("Bright House") respectfully requests that Danielle Frappier, Esquire, associate with the law firm of Davis Wright Tremaine, LLP, be named as a qualified representative authorized to appear on behalf of Bright House before the Florida Public Service Commission for the duration of this proceeding. 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 Ms. Frappier can provide.

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

Davis Wright Tremaine LLP 1919 Pennsylvania Ave., NW, Suite 200 Washington, D.C. (202) 973-4242

For all the foregoing reasons, Bright House respectfully requests that its Request for

Petition for Arbitration November 3, 2009

Qualified Representative Status be granted.

<u>ana ang Pangalak ing katawa na mangalak ang mangalak ang katawa na katawa ang mangalak na mangalak na mangala</u>

Respectfully submitted,

By:

Beth Keating, Esquire Akerman Senterfitt

106 East College Avenue, Suite 1200

P.O. Box 1877 (32302) Tallahassee, Florida 32301

(850) 521-8002

beth.keating@akerman.com

Attorneys for Bright House

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via US Mail or Hand Delivery to the persons listed below this <u>3rd</u> day of November, 2009:

Dulaney L. O'Roark, III, VP/General Counsel	David Christian (Hand Delivery)
Verizon Florida, LLC	Verizon Florida, Inc.
P.O. Box 110, MC FLTC 0007	106 East College Ave.
Tampa, FL 33601	Tallahassee, FL 32301-7748
de.oroark@verizon.com	David.christian@verizon.com
Adam Teitzman, Attorney Supervisor (Hand	Beth Salak, Director/Competitive Markets and
Delivery)	Enforcement (Hand Delivery)
Florida Public Service Commission,	2540 Shumard Oak Blvd.
Office of the General Counsel	Tallahassee, FL 32399-0850
2540 Shumard Oak Blvd.	bsalak@psc.state.fl.us
Tallahassee, FL 32399-0850	
ateitzma@psc.state.fl.us	

By:

Beth Keating

Akerman Senterfitt

106 East College Avenue, Suite 1200

P.O. Box 1877 (32302)

Tallahassee, Florida 32301

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Fax: (850) 222-0103

beth.keating@akerman.com

In Re Bright House Networks Information	)	Docket No.
Services (Florida), LLC	) '	
	)	Filed: November, 2009
Petition for Arbitration of Interconnection	)	
Agreement with Verizon Florida, LLC	)	
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#### **AFFIDAVIT OF DANIELLE FRAPPIER**

#### District of Columbia

- I, DANIELLE FRAPPIER, being first duly sworn, do hereby affirm and attest as follows:
- 1. I am an attorney and associate 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 Maryland Bar, and am seeking qualified representative status to appear on behalf of Bright House before the Florida Public Service Commission.
- 3. I have extensive commercial, regulatory, and telecommunications experience and have appeared in matters before numerous state utility regulatory bodies.
- 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 extent of my knowledge and belief.

Danielle Frappier, Esquire

BEFORE ME, the undersigned authority, perspersonally known by me or who has production and did execute the foregoing.	
SWORN TO AND SUBSCRIBED before me this	October29 th day of November, 2009.
	Notary Public Public
	Carol R. Kaltenbaugh Notary Public, District of Columbia My Commission Expires 9-30-2010
	Typed, Printed, or Stamped Name My Commission Expires: