

# WILEY, REIN & FIELDING

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January 12, 1994

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WRITER'S DIRECT DIAL NUMBER

(202) 828-7514

Mr. Steven Tribble  
Executive Director  
Florida Public Service Commission  
101 E. Gaines Street  
Tallahassee, FL 32399

Re: Petition to Intervene - Docket No. 940000-EE

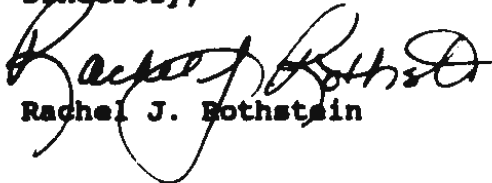
Dear Mr. Tribble:

Enclosed please find an original and 15 copies of a Petition to Intervene on behalf of the Interexchange Access Coalition in the above-reference proceeding.

Also enclosed is a duplicate of this filing. Please date stamp the duplicate and return it to me in the enclosed self-addressed, stamped envelope.

Should any questions arise concerning this filing, please do not hesitate to contact me at the above-referenced number.

Sincerely,



Rachel J. Rothstein

ACK  \_\_\_\_\_  
APC \_\_\_\_\_  
AMC \_\_\_\_\_  
CFC \_\_\_\_\_  
CIC \_\_\_\_\_  
CPC \_\_\_\_\_  
EFC \_\_\_\_\_  
LFC LW/MS \_\_\_\_\_  
LFC 6 \_\_\_\_\_  
CFC 1 \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC  RECEIVED & FILED  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION  
Tallahassee, Florida

FILE COPY

In Re: Request for Approval of )  
Tariff Filing to Restructure the )  
Local Transport Rate Element of ) DOCKET NO. 940020-TL  
Switched Access Service by Central )  
Telephone Company of Florida )

PETITION TO INTERVENE

The Interexchange Access Coalition ("IAC"), by its attorneys, respectfully requests leave to intervene in the above-captioned proceeding pursuant to Rule 25-22.039 of the Florida Administrative Code. IAC requests leave to intervene because its members will be affected directly and substantially by the outcome of this proceeding.

IAC is an ad hoc group of nondominant interexchange carriers. IAC is comprised of the following companies: LDDS-Metromedia Communications, Inc., WilTel, Inc., and U.S. Long Distance, Inc. IAC includes at least four of the eight largest purchasers of access services in the nation.

The Central Telephone Company of Florida, ("Central Telephone") has filed a request for approval to restructure its switched access local transport charges. As interexchange carriers, IAC members purchase access services from Central Telephone and compete with Central Telephone in the long distance market. Indeed, access charges represent the biggest single expense item for each of these companies. Therefore, the Commission's ruling in this proceeding will

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have a profound impact on each of the IAC's members, as well as their customers.

Furthermore, no prejudice will result from allowing IAC to intervene at this time.

WHEREFORE, the IAC respectfully requests leave to intervene and be treated as a party in these proceedings.

Respectfully submitted,

**THE INTEREXCHANGE ACCESS  
CARRIER COALITION**

By 

Brad E. Mutschelknaus  
Rachel J. Rothstein  
Ann M. Szemplenski

of

**WILEY, REIN & FIELDING**  
1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 429-7000

Its Attorneys

January 12, 1994

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of January, 1994,  
I caused copies of the foregoing "PETITION TO INTERVENE" to  
be mailed via first-class postage prepaid mail to the  
following:

Central Telephone Company  
P.O. Box 165000 MC 5326  
Altamonte Springs, Florida 32716-5000  
Attn: General Regulatory Manager

  
Etta L. Wolfe