

Tracy Hatch Attorney Suite 700 101 N. Monroe St. Tallahassee, FL 32301 904 425-6364 FAX: 904 425-6361

May 4, 1998



Mrs. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Dear Mrs. Bayo:

Re: Docket No. 970808-TL/980498-TP

You will find enclosed an original and fifteen (15) copies of AT&T's Petition to Intervene and Prehearing Statement for filing in the above-referenced docket.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

Tracy Hatch

WCV	<del></del>	٨
AFA U	Night	
APP _		TH/mr
CAF _		Enclosures
CMU	0	cc: Parties of Record
CTR _		
EAG _		
LEG _		
LIN _	2	RECEIVED & FILED
OPC -		mor
RCH _		FPSC-BUREAU OF RECORDS
SEC _		

OTH Leach dtt

DOCUMENT NUMBER-DATE

05000 MAY-48

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of GTC, Inc. to	)	
terminate GTC, Inc.'s InterLATA	)	Docket No. 980498
Access Subsidy and Convert to	)	
Payment of Access Charge Revenue	)	
Directly to GTC, Inc.		
	)	
In re: Petition of BellSouth	_)	Docket No. 970808-TL
Telecommunications, Inc. to remove	)	
interLATA subsidy received by St. Joseph	)	Filed: 05/4/98
Telephone & Telegraph Company	)	

## AT&T'S PETITION TO INTERVENE

COMES NOW AT&T Communications of the Southern States, Inc. (hereinafter "AT&T") and, pursuant to Rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced dockets. AT&T respectfully requests that the Commission grant this petition, designating AT&T as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, AT&T respectfully shows as follows:

1. Petitioner's full name and principal place of business are:

AT&T Communications of the Southern States, Inc. 1200 Peachtree Street, N.E. Atlanta, Georgia 30309

 All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

> Tracy Hatch, Esquire AT&T 101 North Monroe Street, Suite 700 Tallahassee, FL 32301

DOCUMENT NUMBER-DATE

- 3. AT&T is a telecommunications company that has been duly certificated by the Commission as an alternative local exchange telecommunications company ("ALEC") and an interexchange company ("IXC") in Florida. As such, AT&T is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact AT&T's ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.
- 4. On July 1, 1997, BellSouth Telecommunications, Inc. (BellSouth) filed a Petition to Remove InterLATA Access Subsidy received by St. Joseph Telephone and Telegraph Company (hereinafter GTC). The petition requested that the interLATA access subsidy payments made by BellSouth to GTC pursuant to the Commission's access charge subsidy mechanism be discontinued.
  - 5. On July 22, 1997, BellSouth filed a revised Petition.
- 6. GTC responded in opposition to BellSouth's initial Petition and its revised Petition.
- 7. On April 6, 1998, GTC, Inc. filed "GTC Inc's Petition to Terminate Access Subsidy and Convert to Payment of Access Charge Revenue directly to GTC, Inc." In its Petition, GTC seeks to require BellSouth to "cease collecting the access charge revenue" and submits that "the IXCs should pay the access charge revenue directly to GTC, Inc."
- 8. On April 30, 1998, Dockets Nos. 970808-TL and 980498-TP were consolidated for hearing.

- 9. As an IXC, AT&T is required to pay GTC, Inc. and BellSouth switched access charges for each long distance call that AT&T originates or terminates within their respective local serving territories.
- 10. AT&T was a party in Docket No. 820537-TP and participated in the proceedings in which the Commission implemented the current system of switched access charges including the interLATA access subsidy mechanism.
- 11. Based on the allegations in BellSouth's petitions and GTC's petition, AT&T's substantial interests may or will be affected by any action which the Commission takes that affects the rates or amounts of switched access charges that AT&T will be required to pay to either GTC or BellSouth or by the disposition of any access charge revenues no longer subject to payment as an access charge subsidy.

WHEREFORE, AT&T requests that it be permitted to intervene in this proceeding and that it be accorded full party status.

Tracy Hatch

AT&T

101 North Monroe Street, Suite 700

Tallahassee, FL 32301

850/425-6364

Attorney for AT&T Communications of the Southern States, Inc.

## CERTIFICATE OF SERVICE

## DOCKETS NOS. 970808-TL AND 980498TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by United States Mail or hand-delivery to the following parties of record this 44 day of May, 1998:

Ms. Nancy White C/o Ms. Nancy Sims BellSouth Telecommunications 150 S. Monroe Street, Suite 400 Tallahassee, Florida 32301

David B. Erwin 127 Riversink Road Crawfordville, FL 32327

Beth Keating Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Charles J. Beck
Deputy Public Counsel
c/o The Florida Legislature
111 W. Madison St.
Suite 812
Tallahassee, FL 32399-1400

Tracy Hatch