

David B. Erwin
Attorney-at-Law

UNCLAS

127 Riversink Road
Crawfordville, Florida 32327

Phone 850.926.9331
Fax 850.926.8448
derwin@lewisweb.net

July 6, 1998

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

Re: Docket No. 980696-TP

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of ITS Telecommunications Systems, Inc.'s Petition for Leave to Intervene, which we ask that you file in the captioned matter.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



David B. Erwin

DBE:jm

Copy to: All parties of record
Robert M. Post, Jr.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPC _____
RCH _____
SEC _____
WAS _____
OTH _____

DOCUMENT NUMBER DATE

07028 JUL 06 1998

FILED AT TALLAHASSEE, FL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of Basic)
Local Telecommunications Service, pursuant)
to Section 364.025, Florida Statutes)
_____)

Docket No.: 980696-TP

Dated: July 6, 1998

**ITS TELECOMMUNICATIONS SYSTEMS, INC.'S
PETITION FOR LEAVE TO INTERVENE**

ITS Telecommunications Systems, Inc., ("ITS" or "Company"), pursuant to Rule 25-22.039, Florida Administrative Code, hereby requests leave to intervene in these proceedings, and as grounds therefor states:

1. ITS is a telephone company lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.

2. The Company's principal office for the conduct of business in Florida is 15925 S. W. Warfield Blvd, Indiantown, Florida 34956. Pleadings and process in this matter may be served upon:

David B. Erwin
127 Riversink Road
Crawfordville, FL 32327

Robert M. Post, Jr.
Post Office Box 277
Indiantown, Florida 34956
Tel.: 561.597.3113
FAX: 561.597.2115

3. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of ITS and its business operations in the State of Florida.

Floyd Self/Doc Horton
Messer, Caparello & Self, P. A.
Post Office Box 1876
Tallahassee, Florida 32302
Ph.: (850)222-0720
Fax: (850)224-4359

Susan Masterton
Senate Committee on Regulated Industries
418 Senate Office Building
Tallahassee, Florida 32399
Ph.: (850)487-5829
Fax: (850)487-5925

Patrick Wiggins
Wiggins & Villacorta
Post Office Drawer 1657
Tallahassee, Florida 32302
Ph.: (850)385-6007
Fax: (850)385-6008

Kimberly Caswell
GTE Florida Incorporated
Post Office Box 110
FLTC0007
Tampa, Florida 33601
Ph.: (813)483-2617
Fax: (813)204-8870

Tom McCabe
TDS Telecom
Post Office Box 189
Quincy, FL 32353-0189
Ph.: (850)875-5207
Fax: (850)875-5225

Peter M. Dunbar/Barbara D. Auger
Pennington, Moore, Wilkinson,
& Dunbar, P. A.
Post Office Box 10095
Tallahassee, Florida 32302-2095
Ph.: (850)222-3533
Fax: (850)222-2126

Ed Paschall
AARP
1923 Atapha Nene
Tallahassee, FL 32301-5850
Ph.: (850)877-1630
or 877-7664

Ben Ochshorn
Florida Legal Services
2121 Delta Boulevard
Tallahassee, Florida 32303
Ph.: (850)385-7900
Fax: (850)385-9998

Kelly Goodnight
Frontier Communications
180 So. Clinton Avenue
Rochester, New York 14646
Ph.: (716)777-7793
Fax: (716)325-1355

Laura Gallagher
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, Florida 32301
Ph.: (850)681-1990
Fax: (850)681-9676

Michael Twomey
8903 Crawfordville Road
Tallahassee, Florida 32310
Ph.: (850)421-9530

Mark Ellmer/Bill Thomas
GTC, Inc.
Post Office Box 220
Port St. Joe, Florida 32457
Ph.: (850)229-7235
Fax: (850)229-8724