BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Competitive Carriers For Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Territory Docket No. 981834-TP Filed: July 7, 1999

PETITION OF MEDIAONE FLORIDA TELECOMMUNICATIONS INC. FOR LEAVE TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, MediaOne Florida Telecommunications Inc. ("MediaOne") respectfully petitions the Florida Public Service Commission ("Commission") for leave to intervene in the above-captioned proceeding. In support thereof, MediaOne states as follows:

1. The petitioner, MediaOne, is a certificated Alternative Local Exchange Company ("ALEC") authorized by the Commission to operate in Florida. MediaOne's business address is 7800 Belfort Parkway, Suite 250, Jacksonville, FL 32256.

2. The names and addresses of the people authorized to receive all notices, pleadings and other communications in this docket are:

Laura L. Gallagher Laura L. Gallagher, P.A. 204 S. Monroe St., Ste. 201 Tallahassee, FL 32301 Tel: 850/ 224-2211 Fax: 850/577-0385 James P. Campbell MediaOne 7800 Belfort Parkway, Ste. 250 Jacksonville, FL 32256 Tel: 904/619-5686 Fax: 904/619-3629

3. On December 10, 1998, the Florida Competitive Carriers Association (FCCA) and several other parties filed a petition for Commission action to support local competition in BellSouth's service territory. By Order dated May 26, 1999, the Commission decided to investigate numerous competitive issues addressed in the

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petition including Operational Support Systems ("OSS"), third party testing of OSS systems, costing and pricing of OSS, and collocation and access to loops.

4. The Commission's decisions on these issues directly and materially affect MediaOne. The company is a certificated ALEC currently competing in BellSouth's territory. MediaOne offers and intends to offer competitive services that will require nondiscriminatory access to the incumbent LEC's network and Operational Support Systems on fair and reasonable terms. Orders of the Commission in this proceeding will directly impact the terms by which MediaOne provides service.

WEHREFORE, MediaOne respectfully requests that the Commission grant its Petition and allow MediaOne to become a full party of record in this docket.

Respectfully submitted this 7th day of July, 1999.

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Laura L. Gallagher *V* Laura L. Gallagher, P.A. 204 S. Monroe Street, Suite 201 Tallahassee, FL 32301 850/224-2211

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Steve Reilly OPC c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400

Bruce May Holland & Knight PO Drawer 810 Tallahassee, FL 32302

Michael Gross FCTA 310 N. Monroe St. Tallahassee, 32302

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Leave to Intervene in Docket No. 981834-TP has been served upon the following parties of record and others by U.S. Mail this 7th day of July, 1999:

Will Cox FPSC 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Kimberly Caswell GTE Florida Inc. PO Box 110, FLTC0007 Tampa, FL 33601-0110

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Laura L. Gallagher, P.A. RECEIVED ATTORNEY AT LAW

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July 7,1999

VIA HAND DELIVERY

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. 981834-TP

Dear Ms. Bayo:

Enclosed for filing in the above referenced docket are the original and fifteen copies of the Petition of MediaOne Florida Telecommunications Inc. for Leave to Intervene.

Copies of this filing have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Yours very truly,

Laura L. Gallagher

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OTH

LLG/cg Enclosure cc: Jim Campbell Dick Karre

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