

ORIGINAL

Florida Cable Telecommunications Association

Steve Wilkerson, President

## VIA HAND DELIVERY

April 5, 2000

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 RECEIVED-FPSI 0 APR -5 AM 8: 4 RECORDS AND REPORTING

RE: Docket No. 000121-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Petition of Florida Cable Telecommunications Association for Leave to Intervene.

Copies of the Petition to Intervene 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.

Sincerely, Michael A. Gross Vice President, Regulatory Affairs & CML OTR EAG LEO. Enclosure MAS OPC ARR cc: All Parties of Record SEC Steven E. Wilkerson Waw VED & FILED

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310 North Monroe Street • Tallahassee, Florida 32301 • (850) 681-1990 FAX (850) 681-9676 • www.fcta.com



## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the establishment ) of operations support systems permanent ) performance measures for incumbent ) local exchange telecommunications ) companies } Docket No. 000121-TP

Filed: April 5, 2000

## PETITION OF FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION FOR LEAVE TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in this docket, and states:

1. FCTA is a non-profit trade association representing the cable telecommunications

industry in Florida<sup>1</sup>. The FCTA's business address is 310 N. Monroe Street, Tallahassee, FL

32301.

2. The name and address of the person authorized to receive all notices, pleadings and

other communications in this docket is:

Michael A. Gross Vice President, Regulatory Affairs & Regulatory Counsel Florida Cable Telecommunications Association 310 N. Monroe Street Tallahassee, FL 32301 Tel: 850/681-1990 Fax: 850/681-9676

3. The issues raised in this docket concern the establishment of permanent operations

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FPSC-RECORDS/REPORTING

<sup>&</sup>lt;sup>1</sup> Certificated telecommunications companies represented by FCTA in this proceeding include: Adelphia Telecommunications of Florida, Inc., Adelphia Business Solutions of Florida, Inc., Adelphia Business Solutions of Florida, LLC, Adelphia Business Solutions of Jacksonville, Inc., Comcast MH Telephony Communications of Florida, Inc., Comcast Telephony Communications of Florida, Inc., Cox Florida Telecom, L.P. d/b/a Cox Communications, Hyperion Telecommunications of Florida, Inc., MediaOne Florida Telecommunications, Inc., and Charter Communications d/b/a Cablevision Communications.

support systems (OSS) performance metrics. The certificated telecommunications companies represented by FCTA in this proceeding are dependent upon the operations support systems of incumbent local exchange carriers in order to provide local service. Accordingly, FCTA's substantial interests will be effected by the outcome of this proceeding regarding establishment of permanent performance measures for incumbent local exchange companies.

4. As the representative of the interests of its members' certificated telecommunications companies, FCTA's intervention is appropriate. Indeed, FCTA has actively sought to promote telecommunications competition as a party of record in Commission proceedings for many years and has been granted intervention in numerous dockets which directly impacted its members.

5. FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple certificated telecommunications companies it represents.

WHEREFORE, for the foregoing reasons, FCTA requests that the Commission grant its Petition for Intervention, and afford FCTA full party status in this proceeding.

Respectfully submitted this 5+1 day of April, 2000.

Michael A. Gross Vice President, Regulatory Affairs & Regulatory Counsel Florida Cable Telecommunications Association 310 N. Monroe Street Tallahassee, FL 32301 Tel: 850/681-1990 Fax: 850/681-9676

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition of Florida Cable Telecommunications Association for Leave to Intervene in Docket 000121-TP has been served upon the following parties by U.S. Mail this  $\mathcal{F}\mathcal{U}$  day of April, 2000:

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