BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate methods to compensate carriers for exchange of traffic subject to Section 251 of the Telecommunications Act of 1996

to:

 $\mathbf{A} \geq \mathbb{R}$

COM

CFR ECR

LEG

OPC. PAL

RGO

SEC SER Docket No. 000075-TP

Filed: August 4, 2000

PETITION OF FOCAL COMMUNICATIONS CORPORATION OF FLORIES

FOR LEAVE TO INTERVENE

COMES NOW Focal Communications Corporation of Florida ("Focal") through counsel, and files this Petition for Leave to Intervene in this proceeding, Docket No. 000075-TP, pursuant to Sections 120.569 and 120.57, Florida Statutes, and Rule 25-22.039, Florida Administrative Code. As grounds, Focal states:

1. The exact name of the Petitioner and its address is:

> Focal Communications Corporation of Florida 200 N. LaSalle Street **Suite 1100** Chicago, Illinois 60601-1914

2. All notices, pleadings, orders, and documents in this proceeding should be provided

> Paul Rebev **Focal Communications Corporation** 200 N. LaSalle Street **Suite 1100** Chicago, Illinois 60601-1914 Telephone (312) 895-8491 Facsimile (312) 895-8403 prebey@focal.com

3. Focal is certificated by the Florida Public Service Commission to provide local telecommunications services. Focal will soon be extending its network to provide these services in the state of Florida.

4. The issues framed in this proceeding for Commission decision concern the establishment of compensation methods for the exchange of traffic subject to Section 251 of the Telecommunications Act of 1996 ("Act"). Focal will exchange such traffic with incumbent local exchange carriers in Florida according to interconnection agreements into which it intends to enter DOCUMENT NUMBER-DATE

09492 AUG-48

FPSC-RECORDS/REPORT 00134

under the Act. Thus, the Commission's decisions in this proceeding, which are anticipated to have general applicability, will affect Focal's substantial interests, entitling Focal to participation with party status as a matter of law.

WHEREFORE, Focal Communications Corporation respectfully requests that it be granted leave to intervene in this proceeding.

This 4th day of August, 2000.

Charles J. Pellegrini

Patrick K. Wiggins

WIGGINS & VILLACORTA, P.A.

2145 Delta Boulevard (32303)

Suite 200

Post Office Drawer 1657

Tallahassee, Florida 2302

(850) 850-6007 telephone

(850) 850-6008 facsimile

wigqvill@nettally.com

Counsel for Focal Communications Corporation of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by

U.S. Mail this 4th day of August, 2000, on the following:

Diana Caldwell
Division of Appeals
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street Suite 400 Tallahassee, FL 32301-1556

James C. Falvey e.spire Communications, Inc. 133 National Business Parkway Suite 200 Annapolis Junction, MD 20701

Global NAPS, Inc. 10 Merrymount Road Quincy, MA 01269

Scott Sapperstein Intermedia Communications Inc. 3625 Queen Palm Drive Tampa, FL 33619-1309

Laura L. Gallagher, P.A. Media One Florida Telecommunications, Inc. 101 E. College Avenue Suite 302 Tallahassee, FL 32301 Marsha E. Rule AT&T 101 North Monroe Street Suite 700 Tallahassee, FL 32301-1549

Michael P. Goggin BellSouth Telecommunications, Inc. 150 West Flagler Street Suite 1910 Miami, FL 33130

Michael A. Gross Florida Cable Telecommunications Assoc., Inc. 310 N. Monroe Street Tallahassee, FL 32301

Kimberly Caswell GTE Florida Incorporated P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

Donna C. McNulty MCI WorldCom 325 John Knox Road Suite 105 Tallahassee, FL 32303-4131

Norman H. Horton, Jr. Messer Law Firm 215 S. Monroe Street Suite 701 Tallahassee, FL 32301-1876 Jon Moyle/Cathy Sellers Moyle Law Firm The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

Peter Dunbar/Karen Camechis Pennington Law Firm P.O. Box 10095 Tallahassee, FL 32302-2095

Charles J. Rehwinkel
Susan Masterton
Sprint-Florida, Incorporated
P.O. Box 2214
MS: FLTLHO0107
Tallahassee, FL 32315-2

Carolyn Marek Time Warner Telecom of Florida, L.P. 233 Bramerton Court Franklin, TN 37069 Herb Bornack
Orlando Telephone Company
4558 S.W. 35th Street
Suite 100
Orlando, FL 32811-654

Kenneth Hoffman/John Ellis Rutledge Law Firm P.O. Box 551 Tallahassee, FL 32302-0551

Mark Buechele Supra Telecom 1311 Executive Center Drive Suite 200 Tallahassee, FL 32301

Wanda Montano
US LEC of Florida Inc.
Morrocroft III
6801 Morrison Boulevard
Charlotte, NC 28211

Charles J. Pellegrini