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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In re: Investigation into the Establishment of
Operations Support Systems Permanent
Performance Measures for Incumbent Local
Exchange Telecommunications Companies

Docket No.: 00012150
Filed: August 25, 2000
RECORDS AND
REPORTING

PETITION TO INTERVENE
Z-TEL COMMUNICATIONS, INC.

Z-Tel Communications, Inc. ("Z-Tel"), pursuant to Rule 28-106.205, Florida Administrative
Code, files this Petition to Intervene and as grounds therefor states:

- 1. The name and address of Petitioner is:

Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, Florida 33602
(813) 233-4630 (telephone)
(813) 233-4620 (fax)

- 2. Copies of all pleadings, notices, and orders in this Docket should be provided to:

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OPC _____
PAL _____
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FPSC-RECORDS/REPORTING

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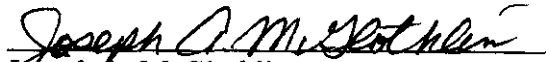
3. **Statement of Substantial Interests.** Z-Tel offers integrated local, long distance, and enhanced services packages to residential consumers in Georgia, Massachusetts, New York, Pennsylvania, and Texas. Z-Tel plans to offer a similar bundle of services to residential consumers in Florida.

4. In providing the local exchange component of its service offering, Z-Tel relies on unbundled network elements ("UNEs") purchased from incumbent local exchange carriers, such as BellSouth, GTE, and Sprint, and must provision those UNEs through use of the incumbent local exchange carriers' operations support systems ("OSS"). Because of its reliance on incumbent UNEs and use of incumbent OSS, performance metrics set by the Commission in this proceeding will directly and substantially affect Z-Tel's ability to provide service to residential consumers in Florida. Therefore, Z-Tel has an important interest in this proceeding.

5. **Statement of Material Facts in Dispute.** Petitioner is unable to identify disputes of material fact at this time.

6. **Ultimate Facts Alleged.** Comprehensive and effective performance measures are essential to ensure that ALECs receive nondiscriminatory access to OSS systems.

WHEREFORE, Z-Tel requests that its Petition to Intervene be granted and that it be accorded full party status in this docket.



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COUNSEL TO Z-TEL COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Petition to Intervene of Z-Tel

Communications, Inc. has been furnished by U.S. mail on Friday, August 25, 2000, to:

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