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GOVERNMENTAL CONSULTANTS: RIGNAMY J. YOUNG

HAND DELIVERY

September 1, 2000

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re:

Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Level 3 Communications, LLC ("Level 3") are the original and fifteen copies of Level 3 Communications, LLC's Petition to Intervene.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely.

Kenneth A. Hoffman

KAH/rl

Enclosures

cc: Parties of Record

\Bayo.level3

NECEIVED & FILED

NON
PSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11298 SEP 128

FPSC-RECORDS/REPORTING

Settle-

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate)	
methods to compensate carriers for)	Docket No. 000075-TP
exchange of traffic subject to Section 251)	
of the Telecommunications Act of 1996.)	Filed: September 12, 2000
	Α	•

PETITION OF LEVEL 3 COMMUNICATIONS, LLC TO INTERVENE

Level 3 Communications, LLC ("Level 3"), by and through its undersigned counsel, and pursuant to Rule 25-22.039, Florida Administrative Code, respectfully petitions the Florida Public Service Commission ("Commission") to grant this Petition to Intervene and permit Level 3 to participate in this proceeding as a party of record, affording it all applicable rights under Florida law and the rules of the Commission. In support of this Petition to Intervene, Level 3 states as follows:

1. Petitioner Level 3's full name and its business address are as follows:

Level 3 Communications, LLC 1025 Eldorado Boulevard Broomfield, Colorado 80021

2. All pleadings, notices, staff memoranda, orders and other documents and communications filed or served in this proceeding should be served on the following on behalf of Level 3:

Michael R. Romano, Esq. Level 3 Communications, LLC 1025 Eldorado Boulevard Broomfield, Colorado 80021 (720) 888-7015 (Telephone) (720) 888-5134 (Telecopier)

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, FL 32302
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DOCUMENT NUMBER-DATE

11298 SEP 12 300162

3. Level 3 is a Delaware limited liability company and is authorized by the Commission

to provide local exchange service in Florida as an alternative local exchange telecommunications

company ("ALEC") pursuant to Certificate No. 5725. As such, Level 3 is subject to the statutes,

rules and orders of the Commission and such statutes, rules and orders impact both Level 3's ability

to provide telecommunications services in Florida and Level 3's ability to compete in Florida.

4. This proceeding will focus on a host of legal, factual and policy issues concerning

the delivery of Internet Service Provider-bound traffic, including whether the delivery of such traffic

is subject to compensation under Section 251 of the Telecommunications Act of 1996 and the

appropriate intercarrier compensation mechanism for the delivery of such traffic. As an ALEC,

Level 3 exchanges traffic with incumbent local exchange companies and other ALECs in order to

provide local exchange service. Thus, the Commission's decisions in this proceeding, which are

anticipated to have general applicability, affect Level 3's substantial interests, entitling Level 3 to

participate with party status as a matter of law.

WHEREFORE, for the foregoing reasons, Level 3 Communications, LLC respectfully

requests that it be granted intervention as a full party in this proceeding.

Respectfully submitted,

Kenneth A. (Hofftplay), Esq.

John R. Ellis, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Petition of Level 3 Communications, LLC to Intervene was furnished by U. S. Mail to the following this 12th day of September, 2000:

Diana Caldwell, Esq.
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, Florida 32399-0850

Elizabeth Howland, Esq. Morton Posner Allegiance Telecom of Florida, Inc. 1950 Stemmons Freeway, Suite 3026 Dallas, TX 75207-3118

Marsha Rule, Esq. AT&T 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

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

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Michael A. Gross, Esq. Florida Cable Telecommunications, Asso. 310 N. Monroe Street Tallahassee, FL 32301

Mr. Paul Rebey Focal Communications Corporation of Florida 200 North LaSalle Street, Suite 1100 Chicago, IL 60601-1914 Global NAPS, Inc. 10 Merrymount Road Quincy, MA 02169

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

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233 Bramerton Court
Franklin, TN 37069

By: KENNETH A. HOFFMAN, ESQ.

sLevel3/intervene