RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS AT LAW

POST OFFICE BOX 551, 32302-0551 215 SOUTH MONROE STREET, SUITE 420 TALLAHASSEE, FLORIDA 32301-1841 J. STEPHEN MENTON R. DAVID PRESCOTT HAROLD F. X. PURNELL GARY R. RUTLEDGE

TELEPHONE (850) 681-6788 TELECOPIER (850) 681-6515

November 27, 2000

HAND DELIVERY

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:

APP

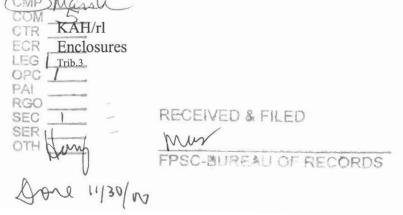
Enclosed herewith for filing in the above-referenced docket on behalf of Allegiance Telecom of Florida, Inc. ("Allegiance") are the original and fifteen copies of Allegiance's Petition to Intervene.

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



DOCUMENT NUMBER-DATE 15177 NOV 278 FPSC-RECORDS/REPORTING

STEPHEN A. ECENIA JOHN R. ELLIS KENNETH A. HOFFMAN THOMAS W. KONRAD MICHAEL G. MAIDA

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 000075-TP

Filed: November 27, 2000

PETITION OF ALLEGIANCE TELECOM OF FLORIDA, INC. TO INTERVENE

Allegiance Telecom of Florida, Inc. ("Allegiance"), 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 Allegiance 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, Allegiance states as follows:

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

Allegiance Telecom of Florida, Inc. 1950 Stemmons Freeway, Suite 3026 Dallas, TX 75207

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

Allegiance:

Elizabeth Howland, Esq. Attention: Regulatory and Interconnection Allegiance Telecom, Inc. 1950 Stemmons Freeway Suite 3026 Dallas, Texas 75207 214-261-8753 (Telephone) 214-261-8770 (Telecopier) Kenneth A. Hoffman, Esq. John R. Ellis, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, FL 32302 (850) 681-6788 (Telephone) (850) 681-6515 (Telecopier)

DOCUMENT NUMBER-DATE

3. Allegiance is authorized by the Commission to provide local exchange service in Florida as an alternative local exchange telecommunications company ("ALEC") pursuant to Certificate No. 7143. As such, Allegiance is subject to the statutes, rules and orders of the Commission and such statutes, rules and orders impact both Allegiance's ability to provide telecommunications services in Florida and Allegiance's ability to compete in Florida.

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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, Allegiance 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 Allegiance's substantial interests, entitling Allegiance to participate with party status as a matter of law.

WHEREFORE, for the foregoing reasons, Allegiance Telecom of Florida, Inc. respectfully requests that it be granted intervention as a full party in this proceeding.

Respectfully submitted,

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

<u>CERTIFICATE OF SERVICE</u>

I HEREBY CERTIFY that a copy of the foregoing Petition of Allegiance Telecom of Florida, Inc. to Intervene was furnished by U. S. Mail to the following this 27th day of November, 2000:

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

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

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

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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FFMAN, ESQ.

Allegiance/intervene