

# MCWHIRTER REEVES

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

**TALLAHASSEE** 

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

August 27, 2001

#### VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re:

Docket No.: 011076-TL

Dear Ms. Bayo:

On behalf of NewSouth Communications (NewSouth), enclosed for filing and distribution are the original and 15 copies of the following:

NewSouth Communications Petition to Intervene.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

Willie Hordon Loufeman

VGK/bae 4PP Enclosure CAF CMP COM: STR ECR EG

OPC

1A<sup>c</sup> ₹GO 3EC

RECEIVED & FILED MUL FFSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10672 AUG 275

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A.

FPSC-COMMISSION CLERK

Done 8/29/01

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into anti-competitive	Docket No. 011076-T
behavior and practices of Verizon Florida	
Inc.	Filed: August 24, 2001
/	

#### **NewSouth Communications Petition to Intervene**

NewSouth Communications (NewSouth), pursuant to rule 28-106.205, Florida Administrative Code, files this Petition to Intervene. As grounds therefor, NewSouth states:

1. The name and address of Petitioner is:

NewSouth Communications Two North Main Street Greenville, South Carolina 29609

2. The name, address and telephone number of persons who should receive copies of all orders, notices and correspondence in this docket are:

Lori Reese
Vice President of Governmental Affairs
NewSouth Communications
Two Main Street
Greenville, South Carolina 29609
(864) 672-5177 (telephone)
(864) 672-5040 (fax)
lreese@newsouth.com

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Decker Kaufman Arnold & Steen, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)
vkaufman@mac-law.com

- 3. NewSouth is a competitive provider in Florida certificated to provide competitive local exchange service and long distance service. As a Florida ALEC and IXC, NewSouth has a substantial interest in ensuring that anticompetitive practices in the Florida telecommunications market are eliminated.
- 4. Disputed issues of fact include, but are not limited to, what anticompetitive practices, if any, are occurring in the marketplace.
- 5. Ultimate facts alleged include, but are not limited to, the fact that this Commission has a duty to eliminate anticompetitive practices so as to facilitate local competition.

WHEREFORE, NewSouth moves this Commission to grant its Petition to Intervene and accord it full party status in this matter.

Clicci Gram Laufman Lori Reese

Vice President of Governmental Affairs

**NewSouth Communications** 

Two Main Street

Greenville, South Carolina

(864) 672-5177 (telephone)

(864) 672-5040 (fax)

Vicki Gordon Kaufman McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, PA 117 South Gadsden Street Tallahassee, Florida 32301 (850) 222-2525 (telephone) (850) 222-5606 (fax)

Attorneys for NewSouth Communications

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing NewSouth Communications Petition to Intervene has been furnished by (\*) hand delivery or by U. S. Mail on this 27th day of August, 2001, to the following:

(\*) Beth Keating Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Kim Caswell Verizon Communications 201 North Franklin Street Post Office Box 110 MC FLTC0007 Tampa, Florida 33601-0110

Clicki Andra Laufman
Vicki Gordon Kaufman