

MCWHIRTER REEVES

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TALLAHASSEE

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

May 10, 2002

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.:000121-C-TP

Dear Ms. Bayo:

On behalf of DIECA Communications Company d/b/a Covad Communications Company, enclosed for filing and distribution are the original and 15 copies of the following:

Petition to Intervene of DIECA Communications Company d/b/a Covad Communications Company.

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,

Wicki Gordon Kaufman

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 000121-C-TP

Filed: May 10, 2002

PETITION TO INTERVENE OF DIECA COMMUNICATIONS COMPANY D/B/A COVAD COMMUNICATIONS COMPANY

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to rule 28-106.205, Florida Administrative Code, files this Petition to Intervene. As grounds therefor, Covad states:

1. The name and address of Petitioner is:

Covad Communications Company 19th Floor, Promenade II 1230 Peachtree Street, NE Atlanta, Georgia 30309

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

William Weber
Covad Communications Company
19th Floor, Promenade II
1230 Peachtree Street, NE
Atlanta, Georgia 30309
(404) 942-3494 (telephone)
(508) 300-7749 (fax)
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wweber@covad.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. In this docket, the Commission will consider the establishment of permanent performance measures for Verizon.
- 4. Covad is a competitive provider in Florida, certificated to provide competitive local exchange service. As a Florida ALEC, Covad has a substantial interest in ensuring that appropriate performance measures are in place related to the performance and operation of Verizon's operational support systems (OSS). Such systems directly affect Covad's ability to compete and provide telecommunications services in Florida.
- 5. Disputed issues of fact may include, but are not limited to, what permanent performance measures should be put in place for Verizon.
- 6. Ultimate facts alleged include, but are not limited to, the fact that appropriate performance measures are necessary to facilitate a competitive local telecommunications market in Florida.

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

William Weber Dufman

Covad Communications Company

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Attorneys for Covad Communications Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene of DIECA Communications Company d/b/a Covad Communications Company has been furnished by (*) Hand Delivery or U.S. Mail this 10th day of May, 2002:

(*) Jason Fudge Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 3239-0850

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