

Virginia Tate Senior Attorney Law and Government Affairs Southern Region Promenade 1 1200 Peachtree Street N.E. Atlanta, GA 30309 404 810 4922 FAX: 404 810-5901

May 29, 2002

Mrs. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Dear Mrs. Bayo:

RE:

Investigation into the establishment of operations support systems permanent

performance measures (Verizon Track)

Docket No. 000121C-TP

Enclosed please find the original and 15 copies of the Petition to Intervene for AT&T Communications of the Southern States, LLC; AT&T Broadband Phone of Florida, LLC; and TCG South Florida, Inc. ("AT&T") in the above-referenced proceeding. Please stamp the extra copy provided and return to me in the enclosed envelope.

Thank you and please contact me if there are any questions regarding this matter.

Sincerely,

Virginia Tate /AD Virginia C. Tate

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment)	Docket No. 000121C-TP
of operations support systems permanent)	
performance measures (Verizon Track))	Filed: May 29, 2002
)	

AT&T'S PETITION TO INTERVENE

COMES NOW AT&T Communications of the Southern States, LLC; AT&T Broadband Phone of Florida, LLC; and TCG South Florida, Inc. (hereinafter "AT&T") and, pursuant to Rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. AT&T respectfully requests that the Commission grant this petition, designating AT&T as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, AT&T respectfully shows as follows:

1. Petitioner's principal place of business is:

AT&T 1200 Peachtree Street, N.E. Atlanta, Georgia 30309

 All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

Virginia Tate, Esq.
Senior Attorney
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309
(404) 810-4922

Lisa A. Riley Docket Manager 1200 Peachtree Street, NE Suite 8100 Atlanta, GA 30309 (404) 810-7812

- 3. AT&T is a telecommunications company that has been duly certificated by the Commission as an alternative local exchange telecommunications company ("ALEC") and an interexchange company ("IXC") in Florida. As such, AT&T is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact AT&T's ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.
- 4. As an ALEC, AT&T must utilize the operations support systems and other facilities of incumbent local exchange companies in order to provide local exchange service. Accordingly, AT&T's substantial interests will be affected by any action that the Commission takes in this docket.

WHEREFORE, AT&T requests that it be permitted to intervene in this proceeding and that it be accorded full party status.

Virginia Tate

AT&T

1200 Peachtree Street, NE

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Attorney for AT&T Communications of the Southern States, LLC; AT&T Broadband Phone of Florida, LLC; and TCG South Florida, Inc.

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