

**ORIGINAL**

June 11, 2002

**VIA OVERNIGHT MAIL**

Ms. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

**Re: ITC^DeltaCom Communications, Inc. – Petition to Intervene  
Docket No. 020119-TP**

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of ITC^DeltaCom Communications, Inc.  
d/b/a ITC^DeltaCom Petition to Intervene in Docket No. 020119-TP.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and  
returning same in the enclosed self-addressed stamped envelope.

I have also enclosed the Affidavit of Nanette Edwards, together with the letter from Jerry Watts  
requesting that Nanette Edwards be named qualified representative of ITC^DeltaCom in the above  
referenced docket.

Should you have any questions, please do not hesitate to contact me at (256) 382-7090.

Sincerely,

**ITC^DELTA COM COMMUNICATIONS, INC.**  
**d/b/a ITC^DELTA COM**

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
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OPC ☒ Enclosures  
MMS \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH \_\_\_\_\_

*Leigh Ann Wooten*  
Regulatory Manager

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DOCUMENT NUMBER-DATE

06139 JUN 13 08

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expedited review and cancellation )  
of BellSouth Telecommunications, Inc.'s Key )  
Customer promotional tariffs and for investigation )  
of BellSouth's promotional pricing and marketing )  
practices, by Florida Digital Network, Inc. )

Docket No. 020119-TP

Filed: June 12, 2002

**PETITION TO INTERVENE**  
**OF ITC^DELTA COM COMMUNICATIONS, INC.**  
**d/b/a ITC^DELTA COM**

**COMES NOW**, ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom ("ITC^DeltaCom") and, pursuant to Rule 25-22.039, Florida Administrative Code, respectfully petitions to intervene in the above-referenced proceeding. In support of its Petition, ITC^DeltaCom states as follows:

1. ITC^DeltaCom is a competitive local exchange carrier with its corporate headquarters located at 1791 O.G. Skinner Drive, West Point, Georgia 31833. ITC^DeltaCom has authorization to provide competitive local exchange services in Florida pursuant to its CPCN: Docket No. 980352-TX Order No. PSC-98-0646A-FOF-TX.

2. Accordingly, ITC^DeltaCom is subject to the rules, regulations, and orders of the Commission, and such rules, regulations, and orders impact ITC^DeltaCom in the provision of telecommunications services in Florida and ITC^DeltaCom's ability to compete.

3. As a Florida ALEC, ITC^DeltaCom has a substantial interest in this proceeding and competitive marketing practices in the Florida telecommunications market.

4. Thus, the rights and interests of ITC^DeltaCom may be substantially affected by any decisions and orders of the Commission pursuant to this proceeding.

DOCUMENT NUMBER-DATE

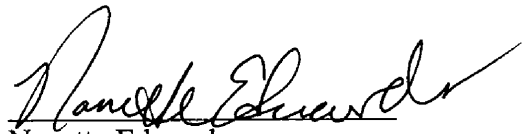
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FDSC-COMMISSION CLERK

5. No other party can adequately represent ITC^DeltaCom's interests.

**WHEREFORE**, ITC^DeltaCom respectfully requests that the Commission grant the Petition to Intervene in full allowing ITC^DeltaCom to participate fully as a party of record including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nanette Edwards", with a long horizontal flourish extending to the right.

Nanette Edwards

Director of Regulatory Advocacy & Sr. Atty.

ITC^DeltaCom

4092 S. Memorial Parkway

Huntsville, Alabama 35802

PH: (256) 382-3856

FAX: (256) 382-3969

### CERTIFICATE OF SERVICE

This is to certify that I have served copies of the Petition to Intervene of ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom upon the following parties of record by first class mail, this 11th day of June, 2002.

*Access Integrated Networks, Inc.  
Mr. Rodney Page  
Riverside Corporate Center  
4885 Riverside Drive, Suite 101  
Macon, GA 31210-1161  
Phone: (478) 476-7940  
Fax: (478) 405-3140*

*BellSouth Telecommunications, Inc.  
Nancy White/James Meza/Patric Turner  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
Phone: (850) 224-7798  
Fax: 222-8640*

*Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Ave., Suite 2000  
Orlando, FL 32801-1640  
Phone: (407) 835-0460  
Fax: (407) 835-0309*

*McWhirter Law Firm  
Joseph McGlothlin  
117 S. Gadsden St.  
Tallahassee, FL 32301  
Phone: 850-222-2525  
Fax: 222-5606*

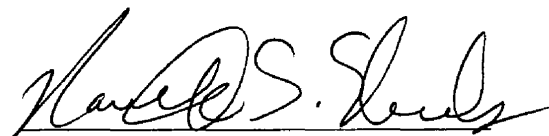
*Pennington Law Firm  
Karen Camechis  
P.O. Box 10095  
Tallahassee, FL 32302-2095  
Phone: 850-222-3533  
Fax: 222-2126*

*Rutledge Law Firm  
Ken Hoffman/Martin McDonnell/M. Rule  
P.O. Box 551  
Tallahassee, FL 32302-0551  
Phone: 850-681-6788  
Fax: 681-6515*

*Time Warner Telecom of Florida, L.P.  
c/o Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069-4002  
Phone: (615) 376-6404  
Fax: (615) 376-6405*

*US LEC of Florida Inc.  
Mr. Greg Lunsford  
6801 Morrison Blvd.  
Charlotte, NC 28211-3599  
Phone: (704) 319-1946  
Fax: (704) 602-1946*

*XO Florida, Inc.  
Ms. Dana Shaffer  
105 Molloy Street, Suite 300  
Nashville, TN 37201-2315  
Phone: (615) 777-7700  
Fax: (615) 345-1564*

  
Nanette S. Edwards, Esq.

June 11, 2002

Ms. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

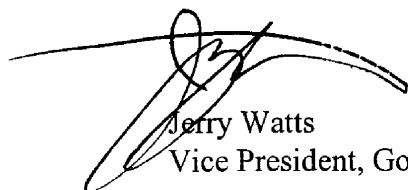
Dear Ms. Bayo:

ITC^DeltaCom Communications, Inc. requests that Nanette Edwards, Director of Regulatory Advocacy and Senior Attorney for ITC^DeltaCom, be named as a qualified representative of ITC^DeltaCom in Docket No. 020119-TP.

Ms. Edwards is located at ITC DeltaCom Communications, Inc., 4092 S. Memorial Parkway, Huntsville, Alabama 35802. ITC^DeltaCom is aware that it can be represented by counsel as defined in Rule 28-106.106 and has chosen otherwise.

Sincerely,

**ITC^DELTACom COMMUNICATIONS, INC.**  
**d/b/a ITC^DELTACom**



Jerry Watts  
Vice President, Government and Industry Relations

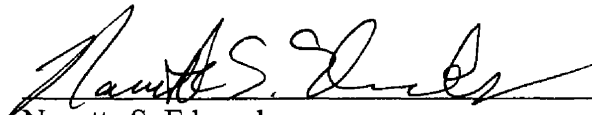
AFFIDAVIT OF NANETTE S. EDWARDS

Undersigned counsel, being first duly sworn, states that:

Undersigned counsel is currently employed by ITC^DeltaCom Communications, Inc., as Director of Regulatory Advocacy and Senior Attorney at the address and telephone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent ITC^DeltaCom's interests in Docket No. 020119-TP.

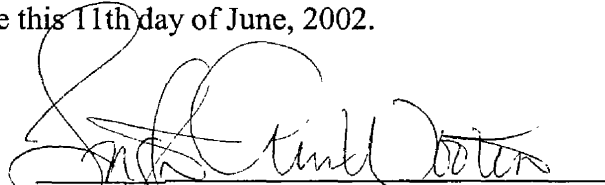
Undersigned counsel is an attorney admitted to practice, and a member in good standing of the State of Alabama, Bar No. 248231223; has practiced extensively before this and other utility regulatory agencies or authorities; has knowledge of the Florida Statutes relative to the Commission's jurisdiction; has knowledge of the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; has knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; has acquired or will acquire knowledge of and compliance with the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.



Nanette S. Edwards  
Director of Regulatory Advocacy & Sr. Atty.  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
Telephone: 256-382-3856

State of Alabama  
County of Madison

Affirmed and subscribed before me this 11th day of June, 2002.



Leigh Ann Wooten (Notary Public)  
My Commission Expires: December 14, 2005

(Seal)