BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications and Information Systems, Inc. against BellSouth Telecommunications, Inc.

In re: Joint petition by ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom d/b/a Grapevine; Birch Telecom of the South, Inc. d/b/a Birch Telecom and d/b/a Birch; DIECA Communications, Inc. d/b/a Covad Communications Company; Florida Digital Network, Inc.; LecStar Telecom, Inc.; MCI Communications, Inc.; and Network Telephone Corporation ("Joint CLECs") for generic proceeding to set rates, terms, and conditions for hot cuts and batch hot cuts for UNE-P to UNE-L conversions and for retail to UNE-L conversions in BellSouth Telecommunications, Inc. service area.

DOCKET NO. 040301-TP

DOCKET NO. 041338-TP Filed: February 14, 2005

IDS TELCOM LLC'S PETITION TO INTERVENE

IDS Telcom LLC, pursuant to rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission (Commission) in the above-referenced docket. IDS requests that the Commission grant this petition, designating Covad 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, IDS states:

1. Petitioner's principal place of business is:

IDS Telcom LLC 1525 NW 167th Street Miami, FL 33169 2. All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

Vicki Gordon Kaufman McWhirter Reeves Davidson Kaufman & Arnold, PA 117 South Gadsden Street Tallahassee, Florida 32301 (850) 222-2525

Angel Leiro IDS Telcom LLC 1525 NW 167th Street Miami, FL 33169

- 3. IDS is a telecommunications company that has been certificated by the Commission as a competitive local exchange telecommunications company (CLEC) and an interexchange company (IXC) in Florida. As such, IDS is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact IDS' ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.
- 4. In this docket, the Commission will review BellSouth's current hot cut process and determine its sufficiency as well as determine what additional processes must be made available to CLECs. The Commission will also review and set rates for such processes.
- 5. As a telecommunications company that must utilize such the hot cut processes, IDS will be substantially affected by action the Commission takes in this docket.

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

S/Vicki Gordon Kaufman

Vicki Gordon Kaufman McWhirter Reeves Davidson Kaufman & Arnold, PA 117 South Gadsden Street Tallahassee, Florida 32301 (850) 222-2525

Attorneys for IDS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of IDS' Petition to Intervention was served by electronic and U.S. Mail this 14th day of February 2005 to the following:

Felicia Banks Florida Public Service Commission 2450 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Kip Edenfield BellSouth Telecommunications, Inc. c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Rose M. Mulvany Birch 2020 Baltimore Avenue Kansas City, MO 64108-1914

Charles (Gene) Watkins Covad Communications Company 1230 Peachtree Street NE, Suite 1900 Atlanta, GA 30309

Matthew Feil FDN Communications 2301 Lucien Way, Suite 200 Maitland, FL 32751-7025

Michael A. Gross Florida Cable Telecommunications Association, Inc. 246 E. 6th Avenue Suite 100 Tallahassee, FL 32303

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Floyd Self Messer Law Firm 215 S. Monroe Street, Suite 701 Tallahassee, FL 32302

Network Telephone Corporation 3300 North Pace Blvd. Pensacola, FL 32505-5148

Brian Chaiken Supra Telecommunications and Information Systems, Inc. 2620 S.W. 27th Avenue Miami, FL 33133

> S/Vicki Gordon Kaufman Vicki Gordon Kaufman