

Tracy Hatch Senior Attorney Law and Government Affairs Southern Region Suite 700 101 N. Monroe Street Tallahassee, FL 32301 850-425-6360

February 21, 2005

## BY ELECTRONIC FILING

Ms. Blanca Bayó, Director The Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 041269-TP

Dear Ms. Bayó:

Attached for filing in the above-referenced docket please find the Petition to Intervene on behalf of AT&T Communications of the Southern States, LLC. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/scd Attachment

cc: Parties of Record

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition to establish generic docket to )	
consider amendments to Interconnection )	Docket No. 041269-TP Filed: February 21, 2005
agreements resulting from changes in )	
law by BellSouth Telecommunications Inc.)	1 iica. 1 cordary 21, 2003

## **PETITION TO INTERVENE**

COMES NOW AT&T Communications of the Southern States, LLC (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 1230 Peachtree Street, N.E. 4<sup>th</sup> Floor Atlanta, Georgia 30309

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

Tracy W. Hatch Senior Attorney AT&T 101 N. Monroe Street Suite 700 Tallahassee, FL 32301 (850) 425-6360 Sonia Daniels Docket Manager 1230 Peachtree Street, NE 4<sup>th</sup> Floor Atlanta, GA 30309 (404) 810-8488

- 3. AT&T is a telecommunications company that has been duly certificated by the Commission as a competitive local exchange telecommunications company ("CLEC") 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. AT&T has an existing Commission approved interconnection agreement with BellSouth Telecommunications Inc and has substantial interest which will be subject to determination or will be affected by resolution of issues in this proceeding.
- 5. Disputed issues of fact may include, but are not limited to, the interpretation and application of the FCC's *Triennial Review Remand Order*.
- 6. Ultimate facts alleged include, but are not limited to, the fact the FCC's *TriennialReviewRemand Order* must be interpreted and applied to facilitate local competition.

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

/s Tracy W. Hatch

Tracy W. Hatch Senior Attorney AT&T 101 N. Monroe Street Suite 700 Tallahassee, FL 32301 (850) 425-6360

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of AT&T's Petition for Intervention was served by electronic and U.S. Mail this 21st day of February 2005 to the following:

Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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