

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)
)
Petition to Establish Generic Docket to) **Docket No. 041269-TP**
Consider Amendments to Interconnection)
Agreements Resulting from Changes of Law) **Filed: July 20, 2005**
_____)

PETITION TO INTERVENE

The Competitive Carriers of the South (CompSouth), pursuant to rule 25-22.039, Florida Administrative Code, file this Petition to Intervene in the above referenced docket. CompSouth requests that its petition be granted, that it be designated as a party of record, and that it be afforded all applicable rights under Florida law and under the rules and regulations of the Florida Public Service Commission (Commission). As grounds therefore, CompSouth states:

1. Petitioner’s principal place of business is:

CompSouth
118 North Gadsden Street
Tallahassee, Florida 32301

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

Vicki Gordon Kaufman
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3. CompSouth is a not-for-profit corporation whose members provide competitive telecommunications services in the state. In this docket, the Commission will address the requirements of the Federal Communications Commission’s (FCC)

Triennial Review Remand Order (TRRO). CompSouth members are a group of companies whose interests will be substantially affected by this Commission's interpretation of the FCC's *TRRO*. Thus, CompSouth's members' substantial interests will be affected by this proceeding and CompSouth has standing to intervene.

4. Disputed issues of fact may include, but are not limited to, the interpretation and application of the FCC's *Triennial Review Remand Order*.

5. Ultimate facts alleged include, but are not limited to, the fact that the FCC's *Triennial Review Remand Order* must be interpreted to facilitate local competition.

6. Any determinations and actions in this docket regarding the *TRRO* will affect the substantial interests of CompSouth members as CLECs operating in Florida. Granting the CompSouth leave to intervene in this docket will provide the Commission with greater insight into the correct interpretation and application of the *TRRO*. CompSouth has standing under Chapter 120, Florida Statutes, and applicable rules to be granted intervention in this proceeding.

WHEREFORE, CompSouth requests the Commission to enter an Order authorizing it to intervene as a full party to this proceeding.

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CERTIFICATE OF SERVICE
Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene was served via Electronic Mail and First Class United States Mail this 20th day of July, 2005 to the following:

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