

LAW OFFICES
Messer, Caparello & Self
A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

December 15, 2005

ELECTRONIC FILING

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

Re: Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of T-Mobile USA, Inc. is an electronic version of T-Mobile USA, Inc.'s Petition to Intervene in the above referenced dockets.

Thank you for your assistance with this filing.

Sincerely yours,

Floyd R. Self



FRS/amb
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Joint petition by TDS Telecom d/b/a)
TDS Telecom/Quincy Telephone;)
ALLTEL Florida, Inc.; Northeast Florida)
Telephone Company d/b/a NEFCOM;)
GTC, Inc. d/b/a GT Com; Smart City) Docket No. 050119-TP
Telecommunications, LLC d/b/a Smart)
City Telecom; ITS Telecommunications)
Systems, Inc.; and Frontier Communications)
of the South, LLC objecting to and requesting)
suspension and cancellation of proposed transit)
traffic service tariff filed by BellSouth)
Telecommunications, Inc.)
_____)

Petition and complaint for suspension and)
cancellation of Transit Traffic Service Tariff) Docket No. 050125-TP
No. FL2004-284 filed by BellSouth) Filed: December 15, 2005
Telecommunications, Inc., by AT&T)
Communications of the Southern States, LLC)
_____)

PETITION TO INTERVENE

T-MOBILE USA, INC. ("T-Mobile"), pursuant to Rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefore states:

1. T-Mobile is a Commercial Mobile Radio Service ("CMRS") provider licensed by the Federal Communications Commission to provide wireless communications services in Florida. Pursuant to Section 364.02(14)(c), Florida Statutes, T-Mobile is not a telecommunications company subject to the jurisdiction of this Commission.

2. T-Mobile's principal place of business is 60 Wells Avenue, Newton, Massachusetts 02459. Pleadings, orders, notices and other papers filed or served in this matter should be served upon:

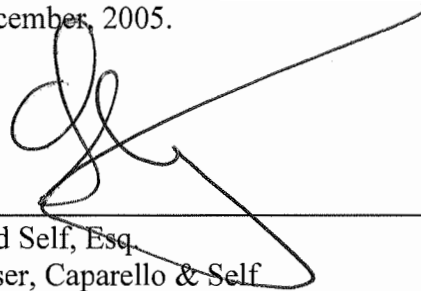
Michele K. Thomas, Esq.
Michele.Thomas@T-Mobile.com
Sr. Corporate Counsel
T-Mobile
60 Wells Avenue
Newton, MA 02459
Phone: 617-630-3126
Fax: 617-630-3187

Floyd Self, Esq.
fself@lawfla.com
Messer, Caparello & Self
Hand: 215 S. Monroe Street, Suite 701
Tallahassee, FL 32301
Mail: P.O. Box 1876
Tallahassee, FL 32302-1876
Phone: 850-222-0720
Fax: 850-224-4359

3. T-Mobile has interconnection agreements with and otherwise exchanges land-to-mobile and mobile-to-land traffic with BellSouth and some of the other incumbent local exchange companies in Florida that are parties to this docket. The scope of this docket and the ultimate resolution of the issues set forth by the FPSC for consideration in this proceeding will have a direct and immediate impact on the ability T-Mobile to exchange traffic in Florida. As such, the resolution of the issues in this docket will affect the substantial interests of T-Mobile and its business operations in the State of Florida.

WHEREFORE, T-Mobile respectfully requests that the Commission grant T-Mobile leave to intervene for all purposes in this docket.

Respectfully submitted this 15th day of December, 2005.

A handwritten signature in black ink, appearing to be 'F. Self', written over a horizontal line.

Floyd Self, Esq.
Messer, Caparello & Self
215 S. Monroe Street, Suite 701
Tallahassee, FL 32302
(850) 222-0720

and

Michele K. Thomas, Esq.
Sr. Corporate Counsel
T-Mobile
60 Wells Avenue
Newton, MA 02459

Attorneys for T-Mobile USA, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by electronic mail and/or U. S. Mail this 15th day of December, 2005

Felicia Banks, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
fbanks@psc.state.fl.us

Kira Scott, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
kscott@psc.state.fl.us

Ms. Kitessa Kennedy
Division of Competitive Markets and
Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
kkennedy@psc.state.fl.us

Stephen B. Rowell
Bettye Willis
ALLTEL
One Allied Drive, B5F11
Little Rock, AR 72202

Mr. James White
ALLTEL
6867 Southpoint Drive., N., Suite 103
Jacksonville, FL 32216-8005
james.white@alltel.com

Tracy W. Hatch
Senior Attorney
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301
thatch@att.com

J. Jeffry Wahlen
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com

Nancy B. White
R. Douglas Lackey
Meredith Mays
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
nancysims@bellsouth.com

Benjamin H. Dickens, Esq.
Blooston Law Firm
2120 L Street, NW, Suite 300
Washington, DC 20037
bhd@bloostonlaw.com

Ms. Angie McCall
Frontier Communications of the South, Inc.
300 Bland Street
Bluefield, WV 24701-3020
AmcCall@czn.com

Mr. Mark Beightol
GT Com
P.O. Box 220
Port St. Joe, FL 32457-0220
mbeightol@fairpoint.com

Mr. Robert M. Post, Jr.
ITS Telecommunications Systems, Inc.
P.O. Box 277
Indiantown, FL 34956-0277
maryannh@itstelecom.net

Ms. Deborah Nobles
NEFCOM
505 Plaza Circle, Suite 200
Orange Park, FL 32073-9409
dnobles@townes.net

Kenneth A. Hoffman, Esq.
Rutledge Law Firm
P.O. Box 551
Tallahassee, FL 32302-0551
ken@reuphlaw.com

Smart City Telecom
P.O. Box 22555
Lake Buena Vista, FL 32830-2555
ibhall@smartcity.com

Mr. Thomas M. McCabe
TDS Telecom/Quincy Telephone
P.O. Box 189
Quincy, FL 32353-0189
Thomas.mccabe@tdstelecom.com

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond & Sheehan, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
vkaufman@moylelaw.com

Charles V. Gerkin, Jr.
Friend Law Firm
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346
cgerkin@fh2.com

MetroPCS California/Florida, Inc.
8144 Walnut Hill Lane, Suite 800
Dallas, TX 75231

Mr. Ronald W. Gavillet
Neutral Tandem-Florida, LLC
One South Wacker, Suite 200
Chicago, IL 60606
rgavillet@neutraltandem.com

Ms. Susan J. Berlin
NuVox Communications, Inc.
Two North main Street
Greenville, SC 29601
sberlin@nuvox.com

Susan Masterton
Sprint Communications Company Limited Partnership
P.O. Box 2214
Tallahassee, FL 32316-2214
susan.masterton@mail.sprint.com

William R. Atkinson, Esq.
Sprint Nextel (GA)
Mail Stop GAATLD0602
3065 Cumberland Circle, SE
Atlanta, GA 30339
bill.atkinson@sprint.com

Floyd R. Self

