

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by BellSouth  
Telecommunications, Inc., pursuant to  
Florida Statutes §364.051(4) to  
Recover 2005 Tropical System  
Related Costs and Expenses

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Docket No. 060598-TL

Filed: September 12, 2006

**NUVOX COMMUNICATIONS, INC.'S  
PETITION TO INTERVENE**

NuVox Communications, Inc. (NuVox), pursuant to rule 25-22.039, Florida Administrative Code, files this Petition to Intervene in the above referenced docket. NuVox 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, NuVox states:

1. Petitioner's principal place of business is:

NuVox Communications, Inc.  
Two North Main Street  
Greenville, SC 29601

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

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3. NuVox is a competitive local exchange company operating in the state of Florida. NuVox purchases unbundled network elements (UNEs) from BellSouth Telecommunications, Inc. (BellSouth).

4. In this docket, the Commission will address BellSouth's request that it be permitted to recover a \$.50 per month surcharge on basic and nonbasic local exchange service lines and on all wholesale UNE customers. Because Nuvox purchases UNEs from BellSouth, its interests will be substantially affected by this Commission's action on BellSouth's request. Thus, NuVox's substantial interests will be affected by this proceeding and NuVox has standing to intervene.

5. Disputed issues of fact may include, but are not limited to, whether it is appropriate for the Commission to permit BellSouth to assess the requested surcharge on wholesale UNE customers.

6. Ultimate facts alleged include, but are not limited to, the fact that BellSouth's proposed surcharge should not be applied to wholesale UNE customers.

7. Any determinations and actions in this docket regarding BellSouth's surcharge request will affect NuVox's substantial interests. NuVox has standing under Chapter 120, Florida Statutes, and applicable rules to be granted intervention in this proceeding.

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

s/ Vicki Gordon Kaufman  
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Attorneys for NuVox

## CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Petition to Intervene was furnished by (\*) electronic and U.S. Mail this 12<sup>th</sup> day of September, 2006 to:

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S/ Vicki Gordon Kaufman  
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