Matilda Sanders



From:CJ Cratty [cjcratty@moylelaw.com]Sent:Wednesday, July 20, 2005 11:06 AMTo:Filings@psc.state.fl.usCc:Adam Kupetsky; Adam Teitzman; Alan Gold; Brian Chaiken; Dana Shaffer; De O'Roark;
Donna McNulty; Floyd Self; Garrett Hargrave; Herb Bornack; Jody Lamar Finklea; John
Heitmann; Jonathan Marashlian; Ken Hoffman; Martin McDonnell; Matthew Feil; Meredith
Mays; Michael Barrett; Michael Gross; Nanette Edwards; Norman H. Horton, Jr.; Raymond
Manasco, Jr.; Sonia Daniels; Steven Chaiken; Susan Masterton; Tracy Hatch; Vicki Gordon
Kaufman; Wanda MontanoSubject:Docket No. 041269-TP

Attachments: Pet.to.Int.w.COS.pdf

<<Pet.to.Int.w.COS.pdf>>

Pursuant to the Commission's procedures for e-filing, DIECA Communications, Inc. d/b/a Covad Communications Company provides the following information:

A. The attorney responsible for filing is:

Vicki Gordon Kaufman Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. The Perkins House 118 North Gadsden Street Tallahassee FL 32301 850.681.3828 850.681.8788 Fax

- B. The document is to be filed in Docket No. 041269-TP.
- C. The document is filed on behalf of DIECA Communications, Inc. d/b/a Covad Communications Company.
- D. The document is 4 pages long.
- **IMP** <u>E</u> The document is entitled Petition to Intervene.

COM <u>S</u> CJ Cratty

CTR

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OPC

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- SCR ____
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- THE Dame
-)TH <u>Rumf</u>
 - 7/20/2005

DOCUMENT NUMBER-DATE

06931 JUL 20 g

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re:

Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting from Changes of Law Docket No. 041269-TP

Filed: July 20, 2005

PETITION TO INTERVENE

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to rule 25-22.039, Florida Administrative Code, files this Petition to Intervene in the above referenced docket. Covad 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, Covad states:

1. Petitioner's principal place of business is:

Covad Communications Co. 1230 Peachtree Street, NE Suite 1900 Atlanta, GA 30309

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

Charles (Gene) E. Watkins Covad Communications Co. 1230 Peachtree Street, NE Suite 1900 Atlanta, GA 30309 (404) 942-3492 <u>GWatkins@Covad.com</u>

Vicki Gordon Kaufman Moyle Flanigan Katz Raymond & Sheehan, PA 118 North Gadsden Street Tallahassee, Florida 32301 (850) 681-3828 <u>vkaufman@moylelaw.com</u>

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

3. Covad is authorized by the Commission to provide local telecommunications services in the state of Florida.

4. Covad has an existing approved interconnection agreement with BellSouth Telecommunications, Inc. (BellSouth) and has substantial interests which will be subject to determination or will be affected by the resolution of issues in this docket.

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 that the FCC's *Triennial Review Remand Order* must be interpreted to facilitate local competition.

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

S/Vicki Gordon Kaufman (Gene) E. Watkins Covad Communications Co. 1230 Peachtree Street, NE Suite 1900 Atlanta, GA 30309 (404) 942-3492 <u>GWatkins@Covad.com</u>

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Attorneys for Covad

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:

Adam Teitzman Michael Barrett Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee FL 32399-0850 <u>ateitzma@psc.state.fl.us</u> <u>mbarrett@psc.state.fl.us</u>

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<u>S/Vicki Gordon Kaufman</u> Vicki Gordon Kaufman