

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory

Docket No. 981834-TP

Filed: March 1, 1999

Vertical stamp: RECEIVED - PUBLIC SERVICE COMMISSION

ACI CORP.'s PETITION TO INTERVENE

ACI Corp. (ACI), pursuant to Rule 25-22.039, F.A.C., hereby petitions the Florida Public Service Commission (Commission) to allow it to intervene in this proceeding. In support thereof, ACI states:

- 1. ACI's address and telephone number are:

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
(303) 476-4200

- 2. All notices, pleadings and orders should be directed to the following ACI representatives:

Richard D. Melson
Gabriel E. Nieto
Hopping Green Sams & Smith, P.A.
Post Office Box 6526
Tallahassee, FL 32314

Jerry Blumenfeld
Elise Kiley
Blumenfeld & Cohen
1615 M Street, NW, Ste.700
Washington, D.C. 20036

- 3. ACI is certified by the Commission as an interexchange carrier and as an alternative local exchange telecommunications company. ACI intends to provide high-speed data communications, including high-speed local access, through the deployment of digital subscriber line (DSL) services to business and residential customers throughout the State of Florida, including areas within

Vertical list of initials: ACK, AFA, AFD, CFC, CFA, ECF, LFA, MFD, NFD, SFD, WFS, DTH

RECEIVED & FILED
[Signature]
REGISTRAR OF RECORDS

DOCUMENT NUMBER-DATE
02500 MAR-1 99
REG-RECORDS/REPORTING

BellSouth's service territory.

4. On or about December 10, 1998, the Florida Competitive Carriers Association and several other petitioners filed a Petition for Commission Action to Support Local Competition in BellSouth's Service Territory. That petition requests the Commission to establish a generic unbundled network element (UNE) pricing docket, establish a forum to address operational issues, establish third party testing of BellSouth's operation support systems (OSS), promulgate rules for expedited dispute resolution and take other actions to further local exchange competition in BellSouth's service territory.

5. As a future provider of facilities-based high-speed data communications services within BellSouth's Florida service territory, ACI's substantial interests will be affected by the Commission's actions in this proceeding. For example, because ACI will purchase UNEs from BellSouth, any actions affecting UNE pricing or OSS testing will impact ACI's substantial interests. As an additional example, should any of ACI's UNE negotiations with BellSouth fail, any dispute resolution procedure promulgated by the Commission will affect ACI's substantial interests.

WHEREFORE, ACI respectfully requests that it be given leave to intervene as a party to this proceeding.

RESPECTFULLY SUBMITTED this 1 day of March, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

Richard D. Melson
Gabriel E. Nieto
P.O. Box 6526
Tallahassee, FL 32314
(850) 222-7500

and

BLUMENFELD & COHEN
Jerry Blumenfeld
Elise Kiley
1615 M Street, NW, Suite 700
Washington, D.C. 20036

ATTORNEYS FOR ACI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 1 day of March, 1999 to the following:

Martha Carter Brown
Division of Legal Services
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Room 390M
Tallahassee, FL 32399-0850

Peter Dunbar
Barbara Auger
Pennington, Moore, Wilkinson,
Bell and Dunbar
Post Office Box 10095
Tallahassee, FL 32301

Angela Green, General Counsel
Florida Public
Telecommunication Association
125 S. Gadsden Street, #200
Tallahassee, FL 32301-1525

Michael A. Gross
Fla. Cable Telecommunications
Association, Inc.
310 North Monroe Street
Tallahassee, FL 32301

Kenneth Hoffman
Rutledge, Ecenia, Purnell and
Hoffman, P.A.
Post Office Box 551
Tallahassee, FL 32302-0551

Susan Huther
MGC Communications, Inc.
3301 Worth Buffalo Drive
Las Vegas, Nevada 89129

Andrew O. Isar
Telecommunications Resellers
Association
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold &
Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

Rhonda P. Merritt
101 North Monroe Street
Suite 700
Tallahassee, FL 32301-1549

Terry Monroe
Vice President, State Affairs
Competitive Telecommunications
Association
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036

Dulaney L. O'Roark
MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 700
Atlanta, GA

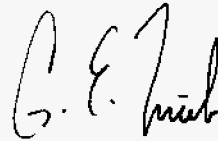
Marsha Rule
Tracy Hatch
101 North Monroe Street
Suite 700
Tallahassee, FL 32301

Floyd Self
Norman H. Horton, Jr.
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street,
Suite 701
Tallahassee, FL 32302-1876

Robert Vandiver
Division of Legal Services
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Room 390M
Tallahassee, Florida 32399-0850

Nancy White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, #400
Tallahassee, Florida 32301-1556

Patrick K. Wiggins
Donna Canzano
Wiggins & Villacorta, P.A.
2145 Delta Boulevard, Suite 200
Tallahassee, Florida 32303



Attorney