Laura L. Gallagher, P.A.

ATTORNEY AT LAW

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July 6,1999

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

RE: Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed for filing in the above referenced docket are the original and fifteen copies of the Petition of MediaOne Florida Telecommunications Inc.'s for Leave to intervene in the above-captioned docket.

Copies of the Petition have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Yours very truly,

AFA APF aura L. Gallaghe CMUrmion CTR EAG LEG +LG/cg MAS Enclosure OPC Jim Campbell RRR CC: RECEIVED & FI FD SEC Dick Karre WAW OTH D FPSC-BUREAU OF RECORDS DOCUMENT NUMBER-DATE 204 SOUTH MONROE STREET, SUITE 201 • TALLAHASSEE, FL 32301 • (850) 224-22 8 1 04 (850) 577-0385 1214 FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Competitive Carriers For Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Territory *990649* Docket No. 981834-TP Filed: July 6, 1999

PETITION OF MEDIAONE FLORIDA TELECOMMUNICATIONS INC. FOR LEAVE TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, MediaOne Florida Telecommunications Inc. ("MediaOne") respectfully petitions the Florida Public Service Commission ("Commission") for leave to intervene in the above-captioned proceeding. In support thereof, MediaOne states as follows:

1. The petitioner, MediaOne, is a certificated Alternative Local Exchange Company ("ALEC") authorized by the Commission to operate in Florida. MediaOne's business address is 7800 Belfort Parkway, Suite 250, Jacksonville, FL 32256.

2. The names and addresses of the people authorized to receive all notices, pleadings and other communications in this docket are:

Laura L. GallagherJames FLaura L. Gallagher, P.A.MediaO204 S. Monroe St., Ste. 2017800 BeTallahassee, FL 32301JacksorTel: 850/ 224-2211Tel: 904Fax: 850/577-0385Fax: 904

James P. Campbell MediaOne 7800 Belfort Parkway, Ste. 250 Jacksonville, FL 32256 Tel: 904/619-5686 Fax: 904/619-3629

3. On December 10, 1998, the Florida Competitive Carriers Association (FCCA) and several other petitioners filed a petition for Commission action to support local competition in BellSouth's service territory. By Order dated May 26, 1999, the Commission granted the request for establishment of a Unbundled Network Element ("UNE") pricing docket. The instant Docket No. 990649-TP was opened to investigate,

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among other things, the pricing of unbundled network elements, requierments to make them available and the performance of cost studies.

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4. The Commission's decisions on these issues directly and materially affect MediaOne. The company is a certificated ALEC currently competing in BellSouth's territory. MediaOne offers and intends to offer competitive services that will require access to reasonably and lawfully priced UNEs of the incumbent LECs. Orders of the Commission in this proceeding will directly impact the terms by which MediaOne provides service.

WEHREFORE, MediaOne respectfully requests that the Commission grant its Petition and allow MediaOne to become a full party of record in this docket. Respectfully submitted this 9th day of June, 1999.

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Laura L. Gallagher () Laura L. Gallagher, P.A. 204 S. Monroe street, Suite 201 Tallahassee, FL 32301 850/224-2211

CERTIFICATE OF SERVICE

HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Leave to Intervene in Docket No. 990649-TP has been served upon the following parties of record and others by U.S. Mail this 6th day of July, 1999:

Will Cox FPSC 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Kimberly Caswell GTE Florida Inc. PO Box 110, FLTC0007 Tampa, FL 33601-0110

Peter M. Dunbar Marc W. Dunbar Pennington Law Firm PO Box 10095 Tallahassee, FL 32302-2095

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Andrew Isar Telecommunications Resellers Assn. PO Box 2461 Gig Harbor, WA 98335-4461

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