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OF COUNSEL  
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July 30, 1999

Executive Director  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

RE: ALLIANCE GROUP SERVICES, INC.  
Docket No. ~~980940-TI~~ 990805.TI

Dear Sir:

Enclosed for filing with the Commission, please find an original and six (6) copies of the above captioned Corporation's PETITION FOR LEAVE TO INTERVENE.

Also enclosed is an exact duplicate of the enclosed. Please stamp the duplicate received and return same in the self-addressed, stamped envelope provided.

Should you have any questions or concerns, please contact me.

Very truly yours,

EARLY, LENNON, PETERS & CROCKER, P.C.

SAFA	_____
APP	_____
C&E	_____
<u>CMUJ</u>	Patrick D. Crocker
CTR	PDC/sem
EAG	_____
LEG	I
MAS	_____
OPC	_____
RRR	_____
SEC	I
WAW	_____
OTH	<i>[Signature]</i>

RECEIVED & FILED  
*[Signature]*  
FPSC-BUREAU OF RECORDS

*Done 8/11/99*

DOCUMENT NUMBER-DATE  
09061 AUG-2 8  
FPSC-BUREAU OF RECORDS/REPORTING

STATE OF FLORIDA  
FLORIDA PUBLIC SERVICE COMMISSION

Alliance Network, Inc.  
Application for a Certificate of Public  
Convenience and Necessity to provide  
Local Exchange and Toll Resale  
Telecommunication Services within the  
State of Florida

Docket No. 990805-TI

**PETITION FOR LEAVE TO INTERVENE**

COMES NOW Alliance Group Services, Inc. and files its Petition For Leave To Intervene in the above-captioned matter, and in support thereof, says as follows:

1. Alliance Group Services, Inc. (hereinafter referred to as "Petitioner") is the owner of a Certificate of Public Convenience and Necessity authorizing the provision of Telephone Toll Resale Service in the State of Florida, pursuant to a Report and Order dated November 30, 1998, in Docket 980940-TI;
2. The records of the Commission will show that Petitioner filed its completed tariff on July 24, 1998, with an issued date of July 24, 1998 and an effective date of July 28, 1998;
3. The official records of the Secretary of State, State of Florida, reflect that Alliance Group Services, Inc. filed its Application for a Certificate of Authority to Transact Business in Florida on July 28, 1998;
4. Petitioner has and is providing telecommunications services in Florida pursuant to its Certificate;
5. The Applicant, "Alliance Network, Inc.", is not affiliated with the Petitioner;
6. If the Commission issues a Certificate in the name of Alliance Network, Inc. in Docket 990805-TI there will result real name identity confusion both with respect to the records of

this Commission and the consuming public of the State of Florida;

7. One need only look at the names, "Alliance Group Services, Inc." versus "Alliance Network, Inc.", to see the real and potential confusion which is not only possible but which no doubt will be probable;

8. In addition to confusion as relates to the records of this Commission and the recognition problems with the consuming public in Florida, Petitioner submits that there may well be real and substantial financial hurt to Petitioner resulting from such confusion; and

9. If the Petitioner is not allowed to intervene and participate in the above-captioned proceeding, the rights and interests of Petitioner will not otherwise be represented and protected.

WHEREFORE, Petitioner respectfully requests that it be allowed to intervene and to fully participate in the hearing of the above-captioned matter. Additionally, Petitioner respectfully submits that a grant of authority to Alliance Network, Inc. will not only not be in the public interest, but will be contrary to the public interest. For the reasons stated, this Commission should deny the Application of Alliance Network, Inc., as currently filed.

Respectfully submitted,

ALLIANCE GROUP SERVICES, INC.

By: \_\_\_\_\_

Patrick D. Crocker  
Early, Lennon, Peters & Crocker, P.C.  
Its Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 30<sup>th</sup> day of July, 1999 served a copy of the foregoing Petition  
To Intervene upon the following by placing a copy of the same in the United States mail, properly  
addressed and postage prepaid.

Lance J.M. Steinhart, Esq.  
6455 East Johns Crossing  
Suite 285  
Duluth, GA 30097

STATE OF FLORIDA

Commissioners:  
JOE GARCIA, CHAIRMAN  
J. TERRY DEASON  
SUSAN F. CLARK  
JULIA L. JOHNSON  
E. LEON JACOBS, JR.



DIVISION OF RECORDS & REPORTING  
BLANCA S. BAYÓ  
DIRECTOR  
(850) 413-6770

## Public Service Commission

June 23, 1999

Lance J.M. Steinhart  
Attorney At Law  
6455 East Johns Crossing, Suite 285  
Duluth, Georgia 30097

Re: Docket No. 990805-TI

Dear Mr. Steinhart:

This will acknowledge receipt of an application for certificate to provide interexchange telecommunications service by Alliance Network, Inc., which was filed with this office on June 22, 1999 and assigned the above-referenced docket number. Appropriate staff members will be advised.

Mediation may be available to resolve any dispute in this docket. If mediation is conducted, it does not affect a substantially interested person's right to an administrative hearing. For more information, contact the Office of General Counsel at (850) 413-6078 or FAX (850) 413-6079.

Please make notes as well that Commission Rule 25-22.005(7), F.A.C., requires certificated companies to notify the Commission of any changes in name, telephone, address, or contact person. Should your application be granted by the Commission, you will be expected to comply with this rule by advising us of any changes as they occur.

Division of Records and Reporting  
Florida Public Service Commission