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Huntsville, AL 35802 > 1-256-382-3900

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MAIL ROOM

March 23, 2000

VIA OVERNIGHT MAIL

Blanca S. Bayó, Director Florida Public Service Commission 2540 Shumard Oaks Blvd. Tallahassee, Florida 32399-0850

> ITC^DeltaCom Communications, Inc. - Petition to Intervene RE:

> > Docket No. 000121-TP

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom Petition to Intervene in Docket No. 000121-TP

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same in the enclosed self-addressed stamped envelope.

I have also enclosed the Affidavit of Nanette Edwards, together with the letter from Chris Rozycki requesting that Nanette Edwards be named qualified representative of ITC^DeltaCom in the above referenced docket.

Should you have any questions, please do not hesitate to Nanette Edwards, Senior Manager Regulatory Attorney at (256) 382-3856.

Sharon B. Killebrew

Paralegal

Enclosure

RECEIVED & FILED

DOCUMENT RUMBER - DATE

BEFORE THE PUBLIC SERVICE COMMISSION OF FLORIDA

DOCKET NO. 000121-TP

In Re: Investigation into the Establishment of)	
Operations Support Systems Permanent)	
Performance Measures for Incumbent Local)	PETITION TO INTERVENE
Exchange Telecommunications Companies)	

COMES NOW, ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom ("ITC^DeltaCom"), pursuant to Rule 25-22.039, Florida Administrative Code, and respectfully petitions to intervene in the above-referenced proceeding. In support of its Petition, ITC^DeltaCom states as follows:

- 1. ITC^DeltaCom is a competitive local exchange carrier with its corporate headquarters located at 1791 O.G. Skinner Drive, West Point, Georgia 31833.
- 2. ITC^DeltaCom, as a competitive local exchange carrier, must utilize the operations support systems of incumbent local exchange carriers in order to provide local service. As such, ITC^DeltaCom's substantial interests will be affected by the outcome in this proceeding regarding establishment of permanent performance measures for ILECs.
- 3. No party will be prejudiced by allowing this late intervention whereas ITC^DeltaCom's rights and interests may be substantially affected by decisions and orders by the Commission pursuant to this proceeding.
- 4. No other party can adequately represent ITC^DeltaCom's interests.
- 5. ITC^DeltaCom take the case as it finds it.

WHEREFORE, ITC^DeltaCom respectfully requests that the Commission grant the Petition to Intervene in full allowing ITC^DeltaCom to participate fully as a party of record including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

Respectfully submitted,

Nanette Edwards Regulatory Attorney

ITC^DeltaCom

4092 S. Memorial Parkway Huntsville, Alabama 35802

PH: (256) 382-3856 FAX: (256) 382-3936 DOCUMENT NUMPER-DATE

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FPSO-RECORDS (REPORTING

CERTIFICATE OF SERVICE

This is to certify that I have served copies of the Petition to Intervene of ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom upon the following parties of record by first class mail, this 23rd day of March, 2000.

AT&T Marsha Rule 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549 Phone: (850) 425-6365

Fax: 425-6361

BellSouth Telecommunications, Inc. Ms. Nancy B. White c/o Nancy H. Sims 150 South Monroe Street, Suite 400

Tallahassee, FL 32301-1556 Phone: (850) 224-7798

Fax: 222-8640

Florida Cable Telecommunications Assoc., Inc.

Michael A. Gross 310 N. Monroe St. Tallahassee, FL 32301 Phone: 850-681-1990

Fax: 681-9676

EMail: mgross@fcta.com

Florida Public Telecommunications Assoc. Angela Green, General Counsel 125 S. Gadsden St., #200 Tallahassee, FL 32301-1525

Phone: 850-222-5050

Fax: 222-1355

GTE Florida Incorporated Kimberly Caswell P.O. Box 110, FLTC0007 Tampa, FL 33601-0110 Phone: (813) 483-2617

Fax: (813) 223-4888

MCD Notice of Workshops (Telecommunications)

MCI WorldCom

Ms. Donna C. McNulty 325 John Knox Road, Suite 105 Tallahassee, FL 32303-4131

Phone: (850) 422-1254

Fax: 422-2586

MediaOne Florida Telecommunications, Inc. c/o Laura L. Gallagher, P.A. 101 E. College Ave., Suite 302 Tallahassee, FL 32301

Phone: 850-224-2211

Fax: 561-6311

Messer Law Firm Floyd Self P.O. Box 1876 Tallahassee, FL 32302 Phone: 850-222-0720

Fax: 224-4359

Pennington Law Firm Peter Dunbar/Karen Camechis P.O. Box 10095 Tallahassee, FL 32302-2095

Phone: 850-222-3533

Fax: 222-2126

EMail: Pete@penningtonlawfirm.com

Represents: Time Warner Rutledge Law Firm Kenneth Hoffman/John Ellis P.O. Box 551 Tallahassee, FL 32302-0551 Phone: 850-681-6788

Fax: 681-6515

Supra Telecom

Mrs. Doris M. Franklin 1311 Executive Center Drive, Suite 200

Tallahassee, FL 32301 Phone: (850) 402-0510

Fax: 402-0522

Time Warner Telecom of Florida, L.P.

Ms. Carolyn Marek 233 Bramerton Court Franklin, TN 37069 Phone: (615) 376-6404

Fax: (615) 376-6405

Represented by: Pennington Law Firm

Vanette S. Edwards, Esq.