

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

RECORDS AND REPORTING

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In Re: INVESTIGATION INTO PRICING OF UNBUNDLED NETWORK ELEMENTS.

Docket Number: 990649 Filed: May 8, 2000

GLOBAL NAPs' PETITION FOR LEAVE TO INTERVENE

GLOBAL NAPs, INC. (hereinafter "GNAPs") files this Petition for Leave to Intervene in the above-referenced proceeding, pursuant to Rule 25-22.039, Florida Administrative Code. In support of this Petition, GNAPs states the following:

I. NAME AND ADDRESS OF AGENCY AND PETITIONER

- 1. The name and address of the affected agency is:

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

- 2. The name and address of the Petitioner is:

GLOBAL NAPs, INC.
10 Merrymount Road
Quincy, Massachusetts 02169

- 3. All pleadings, orders, and other documents directed to the Petitioner are to be served on:

Jon C. Moyle, Jr., Esq.
Cathy M. Sellers, Esq.
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- AFA
APP
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Done 5/10/00 [Signature]
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II. EXPLANATION OF HOW GNAPs' SUBSTANTIAL INTERESTS WILL BE AFFECTED BY COMMISSION DETERMINATION

4. GNAPs is an alternative local exchange telecommunications company ("ALEC") under Florida law. GNAPs provides its customers with intrastate telecommunications services within the State of Florida. GNAPs has entered into interconnection agreements under Section 251 of the Telecommunications Act of 1996 with incumbent local exchange telecommunications companies ("ILECs") regarding telecommunications services provided by the parties within the state of Florida. Key provisions of the interconnection agreements address unbundled network elements. GNAPs offers and intends to offer competitive services that will require access to reasonably and lawfully priced unbundled network elements of the ILECs.

6. In this proceeding, the Commission will address issues regarding the pricing of unbundled network elements. For the reasons discussed in the preceding paragraph, GNAPs' substantial interests will be affected and determined by the Commission in this proceeding. Accordingly, GNAPs is entitled to intervene and participate as a party in this proceeding.

WHEREFORE, GNAPs respectfully requests that the Commission grant this Petition to Intervene in this proceeding, and that it be granted all rights and obligations of a party having intervenor status.

Respectfully submitted this 8th day of May, 2000.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of GLOBAL NAPs, Inc.'s Petition for Leave to Intervene has been furnished by U.S. Mail to the following parties of record this 8th day of May, 2000.


CATHY M. SELLERS

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