MCWHIRTER REEVES



TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

June 20, 2001

VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re:

Docket No.:010345-TP

Dear Ms. Bayo:

On behalf of DIECA Communications Company d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

Petition to Intervene of Covad Communications Company.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

Willia Gram Laufman

VGK/bae

CAF

CMP COM CTR

ECR

PAI RGO

SEC

SER

Enclosure

RECEIVED & FILED

cc: Catherine F. Boone

PSC-BUREAU OF RECORD

lone 6-28-01

DOCUMENT NUMBER-DATE

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, 9.7.6 76 JUN 20 5

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of AT&T Communications of the Southern States, Inc., TCG South Florida, and MediaOne Florida Telecommunications, Inc. for Structural Separation of BellSouth Telecommunications

Docket No. 010345-TP

Filed: June 20, 2001

PETITION TO INTERVENE OF COVAD COMMUNICATIONS COMPANY

DIECA Communications Company d/b/a Covad Communications Company (Covad), pursuant to Rule 28-106.205, Florida Administrative Code, files this Petition to Intervene and as grounds therefor states:

1. The name and address of Petitioner is:

DIECA Communications Company d/b/a Covad Communications Company 2330 Central Expressway Santa Clara, CA

2. Copies of all pleadings, notices, and orders in this Docket should be provided to:

Catherine F. Boone Covad Communications Company 10 Glenlake Parkway, Suite 650 Atlanta, Georgia 30328-3495 (678) 222-3466 (telephone) (678) 320-0004 (fax) cboone@covad.com

Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)
vkaufman@mac-law.com

- Covad is certified by the Commission as an alternative local exchange carrier. Covad 3. is both a competitor of BellSouth Telecommunications, Inc. (BellSouth) in the provision of local service and a customer of BellSouth for unbundled network elements.
- Covad's substantial interests will be affected by any Commission decision in this 4. docket that either grants or denies AT&T's petition to require structural separation of BellSouth's wholesale services (of which Covad is a customer) and BellSouth's retail services (with which Covad is a competitor).

WHEREFORE, Covad requests that its Petition to Intervene be granted and that it be accorded full party status in this docket.

> Uli li Knaw day man Catherine F. Boone

Covad Communications Company 10 Glenlake Parkway, Suite 650

Atlanta, Georgia 30328-3495

(678) 222-3466 (telephone)

(678) 320-0004 (fax)

Vicki Gordon Kaufman

McWhirter, Reeves, McGlothlin, Davidson,

Decker, Kaufman, Arnold & Steen, P.A.

117 South Gadsden Street

Tallahassee, Florida 32301

(850) 222-2525 (telephone)

(850) 222-5606 (fax)

Attorneys for Covad Communications Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the Petition to Intervene of Covad Communications Company has been furnished by U.S. mail or by hand-delivery (*) this <u>20th</u> day of June, 2001 to the following:

(*) Beth Keating Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Jim Lamoureux AT&T 1200 Peachtree Street, NE Room 8068 Atlanta GA 30309

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

Peter Dunbar/Karen Camechis Time Warner Pennington, Moore, Wilkinson, Bell & Dunbar, P.A. 215 South Monroe Street 2nd Floor Tallahassee, Florida 32301 George N. Meros, Jr.
Thomas A. Cloud and
Loris S. Rowe
Gray, Harris and Robinson
301 South Bronough, Suite 600
Post Office Box 11189
Tallahassee, Florida 32302

William B. Graham McFarlain & Cassedy, P.A. 215 S. Monroe Street, Suite 600 Tallahassee, Florida 32301

Suzanne F. Summerlin IDS Telcom L.L.C. 1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301

lilli Gordon Kaufman