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**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Resolution of petition(s) to establish )  
nondiscriminatory rates, terms, and conditions for )  
interconnection involving local exchange companies )  
and alternative local exchange companies pursuant to )  
Section 364.162, Florida Statutes )

Docket No. 950985-TP  
Filed: September 14, 1995

**PETITION TO INTERVENE OF  
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.**

Metropolitan Fiber Systems of Florida, Inc., through its undersigned counsel, and pursuant to Florida Administrative Code Rule 25-22.039, files this Petition to Intervene in the above captioned proceeding and states as follows:

1. Metropolitan Fiber Systems of Florida, Inc. ("MFS-FL") is a certificated Alternative Access Vendor and gave notice on July 3, 1995 that it wishes to provide alternative local exchange telecommunications service in addition to the services authorized in its certificate, effective January 1, 1996. The address of MFS-FL is:

Metropolitan Fiber Systems of Florida, Inc.  
8830 N.W. 18th Terrace, America's Gateway Center  
Miami, FL 33172

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2. The individuals to notify in this proceeding are:

Timothy Devine  
MFS Communications Company, Inc.  
250 Williams St.  
Suite 2200  
Atlanta, GA 30303-1034  
404/224-6115 (ph.)  
404/224-6060 (fax)

Richard M. Rindler  
James C. Falvey  
SWIDLER & BERLIN, CHARTERED  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007  
202/424-7771 (ph.)  
202/424-7645 (fax)

3. Pursuant to Rule 25-22.036(7), Florida Administrative Code, Section 364.162, Florida Statutes, and the Order Establishing Procedure in this docket, Teleport Communications Group Inc. ("TCG") filed, on September 1, 1995, a Petition in the above-captioned docket, requesting that the Commission establish "economically viable, nondiscriminatory mutual compensation rates for the exchange of telephone traffic between TCG and BellSouth Telecommunications, Inc." and to hold a formal proceeding to determine this issue. TCG also reserved the right to petition the Commission as to other co-carrier arrangements should it fail to reach agreement on these issues with BellSouth.

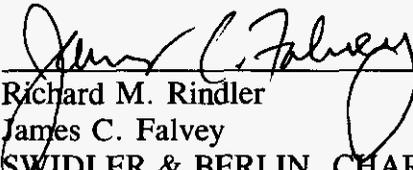
4. As an Alternative Access Vendor that has given notice of its intent to provide local exchange service in Florida and has commenced negotiations with BellSouth on co-carrier carrier issues, MFS-FL has substantial interests that are subject to determination and will be affected through this interconnection proceeding.

5. MFS-FL has not yet filed a petition requesting that the Commission establish co-carrier arrangements in this docket but, in filing this Petition to Intervene, reserves the right to file its own petition should co-carrier negotiations between MFS-FL and BellSouth fail to result in an agreement.

**WHEREFORE**, Metropolitan Fiber Systems of Florida, Inc. respectfully requests that it be allowed to intervene in this proceeding.

Respectfully Submitted,

Timothy Devine  
MFS Communications Company, Inc.  
250 Williams St., Suite 2200  
Atlanta, Georgia 30304-1034  
Phone: (404) 224-6115  
Fax: (404) 224-6060

  
Richard M. Rindler  
James C. Falvey  
SWIDLER & BERLIN, CHARTERED  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007

**Attorneys for Metropolitan Fiber  
Systems of Florida, Inc.**

Dated: September 14, 1995

## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on the 14th day of September, 1995, a copy of the foregoing Petition to Intervene of Metropolitan Fiber Systems of Florida, Inc. was served, via first-class mail, on the following parties:

Mr. Richard H. Brashear  
ALLTEL Florida, Inc.  
P.O. Box 550  
Live Oak, Florida 32060-0550

Mr. Ben Poag  
Central Telephone Company of Florida  
& United Telephone Company of Florida  
Spring/United - Florida  
P.O. Box 165000 (Mail Code #5326)  
Altamonte Springs, Florida 32716-5000

Ms. Laurie A. Maffett,  
Manager, Regulatory Matters  
Frontier Communications  
of the South, Inc.  
Frontier Telephone Group  
180 South Clinton Avenue  
Rochester, New York 14646-0400

Ms. Beverly Y. Menard  
& Mr. Richard M. Fletcher  
GTE Florida Incorporated  
106 East College Avenue  
Suite 1440  
Tallahassee, Florida 32301-7704

Mr. A. D. Lanier,  
General Manager  
Gulf Telephone Company  
P.O. Box 1120  
Perry, Florida 32347-1120

Mr. Robert M. Post, Jr.  
Indiantown Telephone System, Inc.  
P.O. Box 277  
Indiantown, Florida 34956-0277

Mr. John T. McGlew  
Northeast Florida  
Telephone Company, Inc.  
P.O. Box 485  
Macclenny, Florida 32063-0485

Mr. Daniel V. Gregory  
Quincy Telephone Company  
P.O. Box 189  
Quincy, Florida 32353-0189

Ms. Nancy H. Sims  
Southern Bell Telephone  
and Telegraph Company  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301-1556

Mr. John H. Vaughan  
St. Joseph Telephone  
& Telegraph Company  
P.O. Box 220  
Port St. Joe, Florida 32456-0220

Mr. Ferrin Seay  
The Floral Telephone Company, Inc.  
P.O. Box 186  
Floral, Alabama 36442-0186

Ms. Lynn B. Hall,  
Contract & Regulatory Administration  
Vista-United Telecommunications  
P.O. Box 10180  
Lake Buena Vista, Florida 32830-0180

Jodie Donovan  
TCG South Florida (DC)  
1133 21st Street, N.W., #400  
Washington, D.C. 20036

*Sheila M. Beattie*  

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Sheila M. Beattie