## KELLEY DRYE & WARREN LLP

RIGINAL

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

FACSIMILE (202) 955-9792

www.kelleydrye.com

LOS ANGELES, CA CHICAGO, IL

NEW YORK, NY

TYSONS CORNER, VA

STAMFORD, CT

PARSIPPANY, NJ

(202) 955-9600

DIRECT LINE (202) 887-12

BRUSSELS, BELGIUM

HONG KONG

AFFILIATE OFFICES BANGKOK, THAILAND JAKARTA, INDONESIA MANILA, THE PHILIPPINES MUMBAI, INDIA TOKYO, JAPAN

July 12, 2001

VIA UPS NEXT DAY AIR

Division of Records Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Re:

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

Inc.; Docket No. 010345-TP

Dear Sir/Madam:

Enclosed for filing with the Commission please find an original and fifteen copies of the Competitive Telecommunications Association's Petition to Intervene in the abovereferenced proceeding. Also please find enclosed one additional copy and a self-addressed stamped envelope. Please date stamp the additional copy and return to the undersigned.

Thank you for your cooperation in this matter.

FPSC-BUREAU OF RECORDS

Respectfully submitted,

Andrew M. Klein

RECEIVED & FILED

AMK:mla

LEG

Enclosures

OPC PAI

APP CAF

CMP COM

CTR

ECR

RGO

SEC SER

DC01/KLEIA/154534.1

DOCUMENT NUMBER-DATE

08576 JUL 135

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of AT&T Communications of	)	
the Southern States, Inc., TCG South Florida,	)	Docket No. 010345-TP
and MediaOne Florida Telecommunications,	)	
Inc. for Structural Separation of BellSouth	)	Filed: June 22, 2001
Telecommunications, Inc.	)	

## PETITION OF THE COMPETITIVE TELECOMMUNICATIONS ASSOCIATION TO INTERVENE

The Competitive Telecommunications Association ("CompTel") hereby petitions the Florida Public Service Commission ("FPSC" or "Commission") for leave to intervene in the above referenced proceeding, pursuant to Rule 25-22.039, Florida Administrative Code.

CompTel seeks to intervene in support of the Petitioners, AT&T Communications of the Southern States, Inc., TCG South Florida, and MediaOne Florida Telecommunications, Inc. (collectively, "AT&T"), and joins in their request for appropriate proceedings and the entry of an appropriate order requiring the structural separation of BellSouth Telecommunications, Inc. ("BellSouth") into two distinct wholesale and retail corporate subsidiaries.

CompTel is a principal industry association representing competitive telecommunications providers, whose members include many of the competitive local exchange carriers currently competing in Florida. CompTel's members provide a wide range of competitive services to both residential and business customers in the state, including local, long distance, data and Internet services.

CompTel seeks to intervene and participate in this proceeding, as it agrees with AT&T's conclusion that "the promise of local telephone competition has not been fulfilled in

DOCUMENT NUMBER-DATE

Florida." CompTel is now and has been actively involved in several structural separation proceedings, as well as numerous section 271 proceedings at both the state and federal levels. Several of CompTel's members are, in fact, already participating in this proceeding. Permitting CompTel to intervene on behalf of its entire membership would increase the breadth of parties represented in this proceeding.

Should this Petition be granted, CompTel requests that the Commission and all parties please include on the service list the association's Director of Regulatory and State Affairs, Maureen Flood, 1900 M Street, NW, Suite 800, Washington, DC, 20036; (202) 296-6650, (202) 296-7585 (fax).

<sup>&</sup>lt;sup>1</sup> Petition of AT&T Communications of the Southern States, Inc., TCG South Florida, and MediaOne Florida Telecommunications, Inc., for Structural Separation of BellSouth Telecommunications, Inc., Docket No. 010345-TP, at page 1.

## **CONCLUSION**

For the foregoing reasons, CompTel respectfully requests that the Commission grant it leave to intervene, and permission to fully participate in this proceeding.

Respectfully submitted,

Robert J. Aamoth Andrew M. Klein

Kelley Drye & Warren LLP

1200 19th Street, N.W.

Washington, D.C. 20036

(202) 955-9600 (telephone)

(202) 955-9792 (facsimile)

RAamoth@KelleyDrye.com

AKlein@KelleyDrye.com

Counsel for the Competitive Telecommunications Association

Dated: June 21, 2001