



Tracy Hatch Senior Attorney Law and Government Affairs Southern Region

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September 30, 2003

BY HAND DELIVERY

Ms. Blanca Bayó, Director The Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> Docket Nos. 030851-TP and 030852-TP Re:

Dear Ms. Bayó:

Enclosed for filing is an original and fifteen copies of AT&T's Petition to Intervene in the above referenced dockets filed on behalf of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed," and return to Lisa Sapper in the enclosed envelop at the time of filing.

Thank you for your assistance.

Sincerely yours,

Tracy Hotch las Tracy W. Hatch

RECEIVED & FILED

TWH/las Enclosure

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Parties of Record

DOCUMENT NUMBER-DATE

09446 OCT-18

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)	
from Federal Communications Commission) .	Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)	
for Mass Market Customers.)	
In re: Implementation of requirements arising)	
from Federal Communications Commission's)	Docket No. 030852-TP
triennial UNE review: Location-Specific Review)	
for DS1, DS3 and Dark Fiber Loops, and Route-)	Filed: September 30, 2003
Specific Review for DS1, DS3 and Dark Fiber)	
Transport.)	

AT&T'S PETITION TO INTERVENE

COMES NOW AT&T Communications of the Southern States, LLC and TCG South Florida, Inc. (hereinafter "AT&T") and, pursuant to Rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced dockets. AT&T respectfully requests that the Commission grant this petition, designating AT&T as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, AT&T respectfully shows as follows:

1. Petitioner's full name and principal place of business are:

AT&T Communications of the Southern States, LLC 1200 Peachtree Street, N.E. Atlanta, Georgia 30309

2. All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

Tracy Hatch, Esquire AT&T 101 North Monroe Street, Suite 700 Tallahassee, FL 32301 (850) 425-6360

Lisa A. Sapper AT&T 1200 Peachtree Street, NE Suite 8100 Atlanta, GA 30309 (404) 810-7812

- 3. In this docket, the Commission will address the requirements of the Federal Communications Commission's (FCC) *Triennial Review Order*.
- 4. AT&T is a telecommunications company that has been duly certificated by the Commission as a competitive local exchange telecommunications company ("CLEC") and an interexchange company ("IXC") in Florida. As such, AT&T is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact AT&T's ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.
- 5. As a CLEC, AT&T purchases unbundled network elements ("UNEs") from incumbent local exchange companies ("ILECs") and exchanges traffic with ILECs and other CLECs in order to provide local exchange service. Accordingly, AT&T's substantial interests may or will be affected by any action that the Commission takes in this docket regarding the application of the *Triennial Review Order*.

WHEREFORE, AT&T requests that it be permitted to intervene in this proceeding and that it be accorded full party status.

Tracy Hotch las

Tracy Hatch

AT&T

101 North Monroe Street, Suite 700 Tallahassee, FL 32301 850/425-6364

Attorney for AT&T Communications of the Southern States, LLC and TCG South Florida, Inc.

CERTIFICATE OF SERVICE DOCKET NOS. 030851-TP& 030852-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished via U.S.

Mail this 30th day of September, 2003, to the following parties of record:

	DallOanth Tal
Beth Keating	BellSouth Telecommunications, Inc.
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Tracy W. Hatch