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January 12, 2004

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

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of AARP, are an original and 15 copies of a <u>corrected</u> first page to AARP's <u>AARP Motion For Reconsideration Of Order Denying Intervention</u> filed today, which page inadvertently and incorrectly referred to the pleading "in the alternative, files its <u>Amended Petition to Intervene</u>." An Amended Petition to Intervene, if one is filed, will be filed separately and at a later date. Please substitute the corrected pages for those filed in error or, at a minimum, supply the corrected page with the filed pleading.

Thank you for your assistance.

Sincerely yours.

Michael B. Twomey

cc:

Parties of record

AARP CORRECTED FRONT PAGE TO MOTION FOR RECONSIDERATION

DOCUMENT NUMBER - DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

DOCKET NO. 030851-TP

FILED: January 12, 2004

AARP MOTION FOR RECONSIDERATION OF ORDER DENYING INTERVENTION

Pursuant to Sections 120.569 and 120.57(1), Florida Statutes and Rules 25-22.0376, 25-22.060 and 28-106.204, Florida Administrative Code, the AARP, through its undersigned attorney, files its Motion for Reconsideration of Order No. PSC-04-0008-PCO-TP, Order Denying AARP's Petition to Intervene, issued January 2, 2004, and in support thereof, states as follows:

1. In petitions filed in Dockets 03867-EI, 03868-EI and 030869-EI, BellSouth, Sprint and Verizon (the "Big ILECs") repeatedly asserted that their customers were the ultimate beneficiaries of the increased competition that might result from substantially raising residential basic local service rates – assertions this Commission clearly accepted when ordering the residential local rates increases. Now, to the contrary, the companies have made the argument that residential customers, in general, and AARP, which purports to represent the interests of its over 2.6 million members in Florida, specifically, do not have a substantial interest in the outcome of the proceedings in this docket. Secondly, the Big ILECs unfairly demand that AARP be held to a higher pleading standard than any of the many telecommunications companies granted party status in this case, a requirement that is not only unreasonable, but clearly unnecessary given what should be the obvious implications of this highly critical docket for residential local service competition, not only in Florida, but nationwide. The prehearing officer

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