

**FORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint against Verizon Florida, Inc.  
and request for declaratory ruling by  
Bright House Networks Information  
Services, LLC (Florida)

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Docket No. 041170-TP

Filed: December 14, 2004

**COVAD'S PETITION TO INTERVENE**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission (Commission) in the above-referenced docket. Covad requests that the Commission grant this petition, designating Covad 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, Covad states:

1. Petitioner's principal place of business is:

DIECA Communications, Inc. d/b/a Covad Communications  
Company  
1230 Peachtree Street, N.E.  
Suite 1900  
Atlanta, Georgia 30309

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

Charles (Gene) Watkins  
Senior Counsel  
Covad Communications Company  
1230 Peachtree Street, N.E.  
Suite 1900  
Atlanta, Georgia 30309  
(404) 942-3492

Vicki Gordon Kaufman

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117 South Gadsden Street  
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(850) 222-2525

3. Covad is a telecommunications company that has been certificated by the Commission as a competitive local exchange telecommunications company (CLEC) and an interexchange company (IXC) in Florida. As such, Covad is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact Covad's ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.

4. Covad provides service in Florida through various means including the offering of a local service utilizing voice-over-internet-protocol (VOIP). Covad's VOIP product, like the local service provided by Bright House Networks Information Services, LLC, (Bright House) described in its Complaint and Petition for Declaratory Ruling, requires the use of local telephone numbers. When a voice customer chooses the VOIP service Covad offers, that customer may wish to retain his or current telephone number. Any delay or failure in the porting of local telephone numbers for customers subscribing to Covad's local VOIP service will adversely affect Covad's ability to offer its VOIP service. Accordingly, Covad's substantial interests will be affected by any action that the Commission takes in this docket to address the issues raised by Bright House its Complaint and Petition for Declaratory Ruling.

5. In its Order granting AT&T intervention in this docket, Order No. PSC-04-1208-PCO-TP, issued December 7, 2004, the Commission said:

The purpose of this proceeding, among other things, is to address Verizon's number porting procedures for Bright House Networks Information Services (Bright House). Like Bright House AT&T['s] VOIP product requires the use of local telephone numbers. Any delay or failure in the porting of local telephone numbers for customers will adversely affect AT&T's ability to offer its VOIP product. As such, the resolution of the issues in this docket will affect the substantial interests of AT&T and its business operations in the State of Florida.

This conclusion applies equally to Covad and thus Covad's substantial interests will be affected by any action the Commission takes in this docket.

**WHEREFORE**, Covad requests that it be permitted to intervene in this proceeding and that it be accorded full party status.

S/Vicki Gordon Kaufman

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Attorneys for Covad  
Communications Company

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of Covad's Petition to Intervention was served by electronic and U.S. Mail this 14<sup>th</sup> day of December 2004 to the following:

Felicia Banks  
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