



Florida Cable Telecommunications Association

Steve Wilkerson, President

VIA HAND DELIVERY

June 17, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 000121B-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and 15 copies of the Florida Cable Telecommunications Association, Inc.'s Petition for Leave to Intervene.

Copies of the petition have been served on the parties of record pursuant to the attached certificate of service. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Gross". The signature is written in a cursive, flowing style.

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

MAG/mj

Enclosure

cc: All Parties of Record

DOCUMENT NUMBER - DATE

06234 JUN 17 02

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene of the Florida Cable Telecommunications Association in Docket 000121B-TP has been served upon the following parties by U.S. Mail this 17th day of June, 2002:

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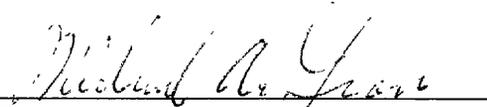
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Michael A. Gross

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Investigation into the establishment)
of operations support systems permanent)
performance measures for incumbent local)
exchange telecommunications companies)
(SPRINT-FLORIDA TRACK))**

Docket No. 000121B-TP

Filed: June 17, 2002

**PETITION OF FLORIDA CABLE TELECOMMUNICATIONS
ASSOCIATION FOR LEAVE TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in this docket, and states:

1. The FCTA is a non-profit trade association representing the cable telecommunications industry in Florida, including certificated alternative local exchange carriers (ALECs) providing local exchange telecommunications service in Florida. The FCTA's business address is 246 E. 6th Avenue, Suite 100, Tallahassee, FL 32303.

2. The name and address of the person authorized to receive all notices, pleadings and other communications in this docket is:

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Association
246 E. 6th Avenue, Suite 100
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3. The FCTA represents ALECs who have been certificated by the Commission to provide

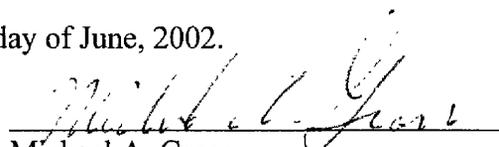
exchange access and local exchange telecommunications services within the State of Florida. Accordingly, the FCTA members are subject to the rules, regulations, and orders of the Commission, and such rules, regulations, and orders impact the FCTA members in the provision of telecommunications services, and their ability to compete. Further, the FCTA members must utilize the operations support systems of incumbent local exchange companies, including Sprint-Florida, in order to provide local exchange service in Florida. Consequently, the FCTA's substantial interests will be affected by any decision regarding permanent performance measures for incumbent local exchange companies.

4. As the representative of the interests of its members' certificated telecommunications carriers, the FCTA's intervention is appropriate. The FCTA has actively sought to promote telecommunications competition as a party of record in Commission proceedings for many years and has been granted intervention in numerous dockets which directly impacted its members.

5. The FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple certificated telecommunications carriers it represents.

WHEREFORE, for the foregoing reasons, the FCTA requests that the Commission grant its Petition for Intervention, and afford the FCTA full party status in this proceeding.

Respectfully submitted this 17th day of June, 2002.


Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
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