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GTE Florida
Incorporated

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November 2, 1991

Mr. Steve C. Tribble, Director
Division of Records & Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399-0865

1921074-TP

Dear Mr. Tribble:

Re: Docket No.
In the Matter of the Petition of Intermedia
Communications of Florida, Inc. for Expanded
Interconnection for AAVs within LEC Central Offices

ACK

ASA _____
RSD _____
CFC _____
Please find enclosed for filing the original and fifteen copies
of GTE Florida Incorporated's Petition to Intervene in the
above referenced matter.

CMH If there are any questions with regard to this matter, please
contact the undersigned at 813-228-3094.

EAG _____
very truly yours,

LEB w/m
LPH
OFC Kimberly Caswell

RCH _____
SEC KC:fm
Enclosures

WAS _____
DTH *Eric Deak*
RECEIVED & FILED

Jew
FPSC BUREAU OF RECORDS

A part of GTE Corporation

DOCUMENT NUMBER-DATE
12811 NOV -2 1991
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of the Petition of)
Intermedia Communications of) Docket No.
Florida, Inc. for Expanded) Filed: 11-2-92
Interconnection for AAVs within)
LEC Central Offices)

PETITION TO INTERVENE OF GTE FLORIDA INCORPORATED

Pursuant to Rule 25-22.039 of the Florida Administrative Code, GTE Florida Incorporated (GTEFL) files its request for intervention in this proceeding initiated through the Intermedia Communications of Florida, Inc. Petition for an Order Permitting AAV Provision of Authorized Services through Collocation Arrangements in LEC Central Offices, filed October 16, 1992. In support of its request, GTEFL states as follows:

1. Petitioner's exact name and the address of its principal business office are:

GTE Florida Incorporated
201 N. Franklin Street, 36th Floor
P. O. Box 110, FLTC0007
Tampa, FL 33601

2. In its filing, Intermedia Communications (ICI) asks the Commission to issue an order directing the local exchange carriers (LECs) to file tariffs allowing alternative access vendors (AAVs) to provide intrastate services through facilities collocated within LEC central offices. Because GTEFL is a Florida LEC, its interests will be substantially and directly affected if the Commission grants the requested order. In fact, ICI specifically mentions

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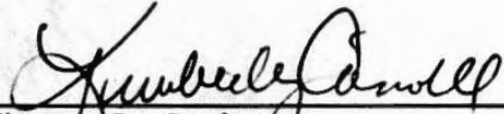
GTEFL in conjunction with its stated desire to obtain collocation arrangements on both interstate and intrastate bases.

3. ICI represents that the Commission fully analyzed the effects of AAV entry into local markets in last year's AAV Order. Generic Investigation into the Operations of Alternate Access Vendors, Docket No. 890193-TL, Order No. 24877 (Aug. 8, 1991). GTEFL takes issue with this unduly broad assessment of the Commission's actions in the AAV area. The Commission's AAV policies concern provision of private line and special access services on a carefully circumscribed basis. Certainly, the Commission did not contemplate arrangements that would allow AAVs to provide service "to any customer located on the ubiquitous LEC network." (ICI Petition at 4.) Conclusions drawn in the context of the AAV proceeding cannot blithely be extended to the situation ICI now raises.

4. In light of the FCC's recent action mandating collocation at the interstate level, it is particularly important for the Commission to affirm its continuing jurisdiction over intrastate collocation matters. GTEFL trusts the Commission will thoroughly and carefully weigh collocation issues, independent of any FCC policy decisions.

GTEFL respectfully asks the Commission to grant this Petition to Intervene in any proceedings that may be initiated in response to ICI's filing.

Respectfully submitted the 2nd day of November, 1992.



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Attorneys for
GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's
Petition to Intervene in Docket No. was mailed by U.S. mail on
November 2, 1992 to the parties on the attached list.


Kimberly Caswell

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Division of Legal Svcs.
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Commission
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