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April 29, 1999

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VIA OVERNIGHT DELIVERY

Blanca Bayo, Director of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 990373-TP; Establishment of a Statewide Emergency Area Code Relief Plan

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket is an original and fifteen copies of the Petition to Intervene of Network Plus, Inc.

Also enclosed is an extra copy to be stamped and returned in the enclosed stamped, self-addressed envelope. Thank you for your attention to this matter.

Sincerely,

Kathleen L. Greenan
Counsel for Network Plus, Inc.

- AFA _____
- APP _____
- CAF _____
- CMU 4 _____
- CTR _____
- EAG _____
- LEG 2 _____
- MAS 5 _____
- OPC _____
- RRR _____
- SEC 1 _____
- WAW _____
- OTH _____

Enclosure

cc w/encl.: Lisa Korner
Richard M. Rindler, Esq.

Done 5/04/99

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
~~85483~~ APR 30 99
FPSC-RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Establishment of a)
Statewide Emergency Area Code)
Relief Plan.)
_____)

Docket No. 990373-TP

Filed: April 30, 1999

PETITION TO INTERVENE OF NETWORK PLUS, INC.

Network Plus, Inc. ("Network Plus"), through its undersigned counsel, and pursuant to Florida Administrative Code § 25-22.039, files this Petition to Intervene in the above-captioned proceeding and states as follows:

1. Network Plus is certificated as Alternative Local Exchange Carrier (ALEC) pursuant to Order of the Florida Public Service Commission ("Commission"). Network Plus maintains its principal place of business at:

234 Copeland Street
Quincy, Massachusetts 02169
Telephone: (617) 786-4000
Facsimile: (617) 786-4084

2. The individuals to notify in this proceeding on behalf of Network Plus:

Richard M. Rindler
Kathleen L. Greenan
Swidler Berlin Shereff Friedman, L.L.P.
3000 K Street, NW, Suite 300
Washington, D.C. 20007-5116
Telephone: (202) 424-7500
Facsimile: (202) 424-7645

3. Network Plus is not aware of any disputed issues of material fact in this proceeding.

4. In this proceeding, the Commission intends to examine the issue of statewide sequential distribution of telephone numbers by code holders. The scope of the proceeding will be

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05483 APR 30 1999

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based upon the issues raised by parties and Commission staff up to and during the prehearing conference.

5. Network Plus has an interest in this proceeding because of its implications for development of local competition in Florida. Network Plus' interests in obtaining and assigning numbers will be directly effected in this proceeding. The public interest will be served by grant of the Petition to Intervene. Network Plus' participation in the proceeding will ensure that a full record reflecting a variety of viewpoints is developed. Network Plus' participation will not delay the conduct of the proceeding or prejudice any other party in any way. No other party will represent Network Plus' interests in this proceeding adequately.

WHEREFORE, Network Plus, Inc. respectfully requests that it be allowed to intervene in this proceeding.

Respectfully Submitted,



Richard M. Rindler
Kathleen L. Greenan
Swidler Berlin Shereff Friedman, L.L.P.
3000 K Street, NW, Suite 300
Washington, D.C. 20007-5116
Telephone: (202) 424-7500
Facsimile: (202) 424-7645

Counsel for Network Plus, Inc.

Dated: April 29, 1999

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of April, 1999, a copy of the foregoing Petition to Intervene of Network Plus, Inc. in Docket No.990373-TP was served, via first-class mail, on the following parties:

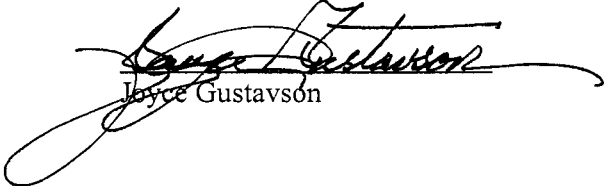
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