# MESSER, CAPARELLO & SECFIVED FPSC A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701 01 FEB 19 PM 3: 13

POST OFFICE BOX 1876

TALLAHASSEE, FLORIDA 32302-1876

TELEPHONE: (850) 222-0720 TELECOPIER: (850) 224-4359 INTERNET: www.lawfla.com

February 19, 2001

RECUING AND REPORTING

# BY HAND DELIVERY

Ms. Blanca Bayó, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> FPSC Docket No. 001503-TP Re:

Dear Ms. Bayó:

Enclosed for filing on behalf AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. are an original and fifteen copies of AT&T's Petition to Intervene in the above-referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. APP CAF

Thank you for your assistance with this filing.

Sincerel

OTH HAFRS/amb Enclosure

CMP

COM CTR EUR

LEG OPC Pal RGO SEC SER

> Marsha Rule, Esq. Parties of Record

DOCUMENT NUMBER-DATE

02287 FEB 195

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Cost recovery and allocation issues	)	Docket No. 001503-TP
for number pooling trials in Florida	)	Filed: February 19, 2001
	)	

### PETITION TO INTERVENE

AT&T Communications of the Southern States, Inc. and AT&T Wireless Services, Inc. (collectively "AT&T"), through undersigned counsel, hereby file this Petition to Intervene in this docket and as grounds would show:

1. The addresses of these petitioners are:

AT&T Communications of the Southern States, Inc. 101 N. Monroe St., Suite 700 Tallahassee, FL 32301 AT&T Wireless Services, Inc. P.O. Box 97061 Redmond, WA 98073-9761

2. Copies of notices, pleadings and documents in this proceeding should be provided

Floyd R. Self Messer, Caparello & Self, P.A. 215 S. Monroe Street, Suite 701 Tallahassee, Florida 32301-1876

Tel: 850-222-0720 Fax: 850-224-4359 E-Mail: fself@lawfla.com

to:

Monroe Street, Suite 701 States, Inc. see, Florida 32301-1876 101 N. Monroe St., Suite 700

Tallahassee, FL 32301 Tel: (850)425-6364

AT&T Communications of the Southern

Fax: (850)425-6361

Marsha Rule

3. Each of the AT&T carriers named above provide telecommunications services in the state and participate in, or will participate at a later date, the pooling trials being conducted by this Commission pursuant to the FCC's delegation order. Accordingly, any cost recovery for pooling trials adopted by the Commission in this docket will affect the substantial interests of AT&T.

WHEREFORE, AT&T respectfully requests that the Commission grant the request to intervene.

Respectfully submitted

Floyd R. Self

Messer, Caparello & Self, P.A.

215 S. Monroe Street, Suite 701

P.O. Box 1876

Tallahassee, FL 32302-1876

(850) 222-0720

Attorneys for AT&T Communications for the Southern States, Inc. and AT&T Wireless Services, Inc.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of AT&T's Petition to Intervene in Docket 001503-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 19th day of February, 2001.

Patricia Christensen, Esq.\*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Ms. Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Jim Meza, Esq.
BellSouth Telecommunications, Inc.
150 West Flagler Street, Suite 1910
Miami, FL 33130

R. Douglas Lackey BellSouth Telecommunications, Inc. 675 W. Peachtree St., NE, #4300 Atlanta, GA 30375

Michael Gross, Esq. Florida Cable Telecommunications Association 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

Charles Beck Office of Public Counsel c/o The Floirda Legislature 111 W. Madison St., #812 Tallahassee, FL 32399-1400

Peter Dunbar/Karen Camechis Pennington Law Firm P.O. Box 10095 Tallahassee, FL 32302-2095 Jeff Pfaff Sprint PCS 4900 Main Street, 11th Floor Kansas City, MO 64112

Susan S. Masterton Sprint-Florida, Incorporated P.O. Box 2214 Tallahassee, FL 32316-2214 Ms. Carolyn Marek Time Warner Telecom of Florida, L.P. 233 Bramerton Court Franklin, TN 37069-4002

Kimberly Caswell Verizon Florida Inc. P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

Anne Hoskins, Esq. Verizon Wireless 1300 "Eye" Street, N.W., Suite 400 Washington, DC 20005

Kenneth Hoffman John Ellis Rutledge Law Firm P.O. Box 551

Tallahassee, FL 32302-0551

Floyd B