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Florida Cable Telecommunications Association

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Steve Wilkerson, President

**VIA HAND DELIVERY**

April 12, 2001

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**RE: Docket No. 010345-TP**

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Petition of Florida Cable Telecommunications Association for Leave to Intervene.

Copies of the Petition to Intervene have been served on the parties of record. 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 that reads "Michael A. Gross". The signature is written in a cursive, flowing style.

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

Enclosure

cc: All Parties of Record

DOCUMENT NUMBER-DATE

04553 APR 12 01

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Petition of AT&T Communications of )  
the Southern States, Inc., TCG South Florida )  
and MediaOne Florida Telecommunications, )  
Inc. for Structural Separation of BellSouth )  
Telecommunications, Inc. into two distinct )  
wholesale and retail corporate subsidiaries )  
\_\_\_\_\_ )**

**Docket No. 010345-TP**

**Filed: April 12, 2001**

**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. 6<sup>th</sup> 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. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676  
E-mail: mgross@fcta.com

3. The issues raised in this docket concern whether, in the interest of the development of

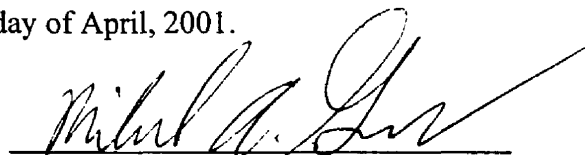
a competitive local exchange market, the Commission should require BellSouth Telecommunications, Inc. (BellSouth) to form separate wholesale and retail entities. Accordingly, the FCTA's substantial interests will be affected by the outcome of this proceeding to determine whether a structurally realigned BellSouth would promote competition in the local exchange telecommunications market.

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 12<sup>th</sup> day of April, 2001.



Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition of Florida Cable Telecommunications Association for Leave to Intervene in Docket 010345-TP has been served upon the following parties by U.S. Mail this 12~~th~~ day of April, 2001:

AT&T  
AT&T Digital Phone  
TCG South Florida  
Ms. Rhonda Merritt  
101 N. Monroe Street, Suite 700  
Tallahassee, FL 32301-1549

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

BellSouth Telecommunications, Inc.  
James Meza, III  
150 West Flagler Street, Suite 1910  
Miami, FL 33130


Florida Competitive Carriers Assoc.  
c/o McWhirter Law Firm  
Vicki Kaufman  
117 S. Gadsden Street  
Tallahassee, FL 32301

Maxcess, Inc.  
Ms. Doris Franklin  
315 South Calhoun Street, Suite 314  
Tallahassee, FL 32301-1837

MCI Telecommunications Corporation  
Mr. Brian Sulmonetti  
Concourse Corporate Center Six  
Six Concourse Parkway, Suite 3200  
Atlanta, GA 30328

Pennington Law Firm  
Peter Dunbar/Karen Camechis  
P.O. Box 10095  
Tallahassee, FL 32302-2095

Time Warner Telecom of Florida, L.P.  
Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
233 Bramerton Court  
Franklin, Tennessee 37069

  
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Michael A. Gross