

ORIGINAL

MCWHIRTER REEVES
ATTORNEYS AT LAW

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

August 27, 2001

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 011075-TL

RECEIVED FPSC
01 AUG 27 PM 3:56
COMMISSION
CLERK

Dear Ms. Bayo:

On behalf of NewSouth Communications (NewSouth), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ NewSouth Communications Petition to Intervene.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

APP _____ VGK/bae
 CAF _____ Enclosure
 CMP _____
 COM 5
 CTR _____
 ECR _____
 LEG 1
 OPC _____
 PAI _____
 RGO _____
 SER 1
 TTH Hand Done 8/29/01

RECEIVED & FILED
RLM
FPSC-BUREAU OF RECORDS

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEIN

DOCUMENT NUMBER-DATE
10673 AUG 27 01
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into anti-competitive behaviors and practices of Sprint-Florida, Incorporated.

Docket No. 011075-TL

Filed: August 27, 2001

NewSouth Communications Petition to Intervene

NewSouth Communications (NewSouth), pursuant to rule 28-106.205, Florida Administrative Code, files this Petition to Intervene. As grounds therefor, NewSouth states:

1. The name and address of Petitioner is:

NewSouth Communications
Two North Main Street
Greenville, South Carolina 29609

2. The name, address and telephone number of persons who should receive

copies of all orders, notices and correspondence in this docket are:

Lori Reese
Vice President of Governmental Affairs
NewSouth Communications
Two Main Street
Greenville, South Carolina 29609
(864) 672-5177 (telephone)
(864) 672-5040 (fax)
lreese@newsouth.com

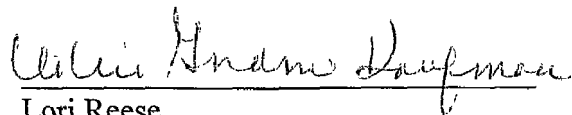
Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Decker Kaufman Arnold & Steen, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)
vkaufman@mac-law.com

3. NewSouth is a competitive provider in Florida certificated to provide competitive local exchange service and long distance service. As a Florida ALEC and IXC, NewSouth has a substantial interest in ensuring that anticompetitive practices in the Florida telecommunications market are eliminated.

4. Disputed issues of fact include, but are not limited to, what anticompetitive practices, if any, are occurring in the marketplace.

5. Ultimate facts alleged include, but are not limited to, the fact that this Commission has a duty to eliminate anticompetitive practices so as to facilitate local competition.

WHEREFORE, NewSouth moves this Commission to grant its Petition to Intervene and accord it full party status in this matter.



Lori Reese

Vice President of Governmental Affairs
NewSouth Communications
Two Main Street
Greenville, South Carolina
(864) 672-5177 (telephone)
(864) 672-5040 (fax)

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Decker Kaufman Arnold & Steen, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)

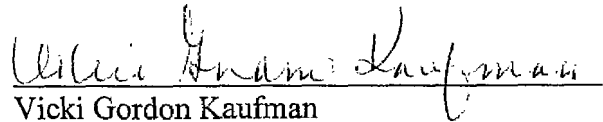
Attorneys for NewSouth Communications

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing NewSouth Communications Petition to Intervene has been furnished by (*) hand delivery or by U. S. Mail on this 27th day of August, 2001, to the following:

(*) Beth Keating
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Charles Rehwinkel
Sprint
1313 Blairstone Road
MS: FLTLHO#0107
Tallahassee, Florida 32301


Vicki Gordon Kaufman