

ORIGINAL

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August 30, 2001

**VIA HAND DELIVERY**

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

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COMMISSION  
CLERK

Re: Docket No.: 011077-TL

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc., Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ DIECA Communications, Inc. d/b/a Covad Communications Company's 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

APP \_\_\_\_\_  
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COM 5  
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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

*Eng done 8/31/01*

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into ant-competitive  
behaviors and practices of BellSouth  
Telecommunications, Inc.

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Docket No. 011077-TL

Filed: August 30, 2001

**DIECA Communications, Inc. d/b/a  
Covad Communications Company's Petition to Intervene**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad),  
pursuant to rule 28-106.205, Florida Administrative Code, files this Petition to Intervene.

As grounds therefor, Covad states:

1. The name and address of Petitioner is:

Covad Communications Company  
10 Glenlake Parkway, Suite 650  
Atlanta, GA 30328

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

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

Catherine F. Boone  
Covad Communications Company  
10 Glenlake Parkway, Suite 650  
Atlanta, GA 30328  
(678) 579-8388 Telephone  
(678) 320-9433 Telefax  
[cboone@covad.com](mailto:cboone@covad.com)

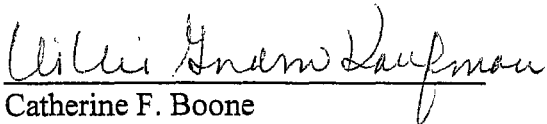
Vicki Gordon Kaufman  
McWhirter Reeves McGlothlin Davidson  
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117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525 (telephone)  
(850) 222-5606 (fax)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

3. Covad is a competitive provider in Florida certificated to provide competitive local exchange service. As a Florida ALEC, Covad 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**, Covad moves this Commission to grant its Petition to Intervene and accord it full party status in this matter.



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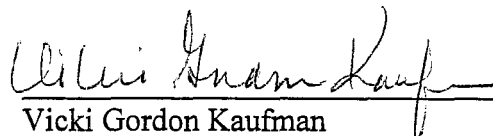
Attorneys for DIECA Communications, Inc.  
d/b/a Covad Communications Company

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Covad Communications Company's Petition to Intervene has been furnished by (\*) hand delivery or by U. S. Mail on this 30th day of August, 2001, to the following:

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

Nancy B. White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Miami, Florida 32301

  
\_\_\_\_\_  
Vicki Gordon Kaufman