

In re: Investigation into Anticompetitive Behavior and Practices of Sprint-Florida, Incorporated. )  
)  
)  
)

Docket No. 011075 -TP

Filed on: September 4, 2001

**Supra Telecommunications and Information Systems, Inc.  
Petition to Intervene**

Supra Telecommunications and Information Systems, Inc. (Supra Telecom), pursuant to Rule 28-106.206, Florida Administrative Code, files this Petition to Intervene. As grounds therefore, Supra states:

- 1. The name and address of Petitioner is:

Supra Telecommunications and Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133

- 2. The name, address and telephone number of persons who should receive copies of all orders, notices and correspondence in this docket are:

Brian Chaiken  
General Counsel  
Supra Telecommunications and Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133  
Telephone: (305) 476-4248  
Facsimile: (305) 443-9516  
bchaiken@stis.com

Ann Shelfer  
V.P.-Public Policy Advocate  
Supra Telecommunications and Information Systems, Inc.  
1311 Executive Center Drive, Suite 200  
Tallahassee, Florida 32301-5027  
Telephone: (850) 402-0510  
Facsimile: (305) 402-0522  
ashelfer@stis.com

RECEIVED-PPSC  
01 SEP -4 PM 4:41  
COMMISSION  
CLERK

RECEIVED  
SEP 4 2001  
PPSC  
CLERK

RECEIVED & FILED  
*RLM*  
PPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
10950 SEP-4 01  
PPSC-COMMISSION CLERK

079-10 Nong

3. Supra Telecom is a competitive provider in Florida certificated to provide competitive local exchange service and long distance service. As a Florida ALEC and IXC, Supra Telecom 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 facts that this Commission has a duty to eliminate anticompetitive practices so as to facilitate local competition.

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



Brian Chaiken  
General Counsel  
Supra Telecom  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133  
Telephone: (305) 476-4248  
Facsimile: (305) 443-9516

Pennington Law Firm  
Peter Dunbar/Karen Camechis  
P.O.Box 10095  
Tallahassee, FL 32301

Time Warner Telecom of Florida, L.P.  
c/o Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069-4002

A handwritten signature in cursive script that reads "Brian Chaiken" followed by a stylized monogram "JTB".

Brian Chaiken  
General Counsel  
Supra Telecom  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133  
Telephone: (305) 476-4248  
Facsimile: (305) 443-9516

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Supra Telecom Petition to Intervene has been furnished by (\*) hand delivery or by U.S. Mail on this 4<sup>th</sup> day of September 4, 2001, to the following

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

Charles Rehwinkel  
Sprint-Florida, Incorporated  
315 S. Calhoun Street, Suite 500  
Tallahassee, FL 32301

F.B. (Ben) Poag  
Sprint-Florida, Incorporated  
P.O. Box 2214  
Tallahassee, FL 32316-2214

Florida Cable Telecommunications Assoc., Inc.  
Michael A. Gross  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303

Florida Public Telecommunications Assoc.  
Angela Green, General Counsel  
2292 Wednesday Street  
Tallahassee, FL 32308-4334

McWhirter Law Firm  
Vicki Kaufman  
117 S. Gadsden Street  
Tallahassee, FL 32301

Messer Law Firm  
Norman H. Horton, Jr  
P.O. Box 1876  
Tallahassee, FL 32302

NewSouth Communications  
Lori Reese  
Two Main Street  
Greenville, SC 29609