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September 27, 2001

Mrs. Bianca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Dear Mrs. Bayo:

RE: Docket Nos. 011075-TL, 011076-TL, and 011077-TL

Enclosed please find the original and 15 copies of AT&T's Petitions to Intervene in the above-referenced proceedings. Please stamp the extra copies provided and return in the enclosed envelope for our records.

Thank you and please contact the undersigned if there are any questions regarding this matter.

Sincerely,

James P. Lamoureux

**Enclosures** 

cc: Parties of Record

DOCUMENT NUMBER-DATE

12196 SEP 27 =

FPSC-COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into allegations of	)	Docket No. 011077-TL
anti-competitive behaviors and practices	)	
of BellSouth Telecommunications, Inc.	)	
	)	Filed: September 27, 2001
	)	

## AT&T'S PETITION TO INTERVENE

COMES NOW AT&T Communications of the Southern States, Inc.; AT&T Broadband Phone of Florida, LLC; and TCG South Florida, Inc. (hereinafter "AT&T") and, pursuant to Rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. AT&T respectfully requests that the Commission grant this petition, designating AT&T as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, AT&T respectfully shows as follows:

1. Petitioner's principal place of business is:

AT&T 1200 Peachtree Street, N.E. Atlanta, Georgia 30309

 All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

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FPSC-COMMISSION CLERK

James P. Lamoureux, Esq. AT&T 1200 Peachtree Street, NE Suite 8100 Atlanta, GA 30309 (404) 810-4196

- 3. AT&T is a telecommunications company that has been duly certificated by the Commission as an alternative local exchange telecommunications company ("ALEC") and an interexchange company ("IXC") in Florida. As such, AT&T is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact AT&T's ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.
- 4. As an ALEC, AT&T must utilize the operations support systems and other facilities of incumbent local exchange companies in order to provide local exchange service. Accordingly, AT&T's substantial interests will be affected by any action that the Commission takes in this docket.

WHEREFORE, AT&T requests that it be permitted to intervene in this proceeding and that it be accorded full party status.

James P. Lamoureux

AT&T

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Atlanta, GA 30309

(404) 810-4196

Attorney for AT&T Communications of the Southern States, Inc.; AT&T Broadband Phone of Florida, LLC; and TCG South Florida, Inc.

#### CERTIFICATE OF SERVICE

#### DOCKET NO. 011077-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished via U.S.

Mail this day 27th of September, 2001, to the following parties of record:

BellSouth Telecommunications, Inc. Ms. Nancy B. White c/o Ms. Nancy H. Sims Tallahassee, FL 32301-1556 Phone: (850) 224-7798

Fax: 222-8640

Email: nancy.sims@bellsouth.com

Covad Communications Company Catherine F. Boone 10 Glenlake Parkway, Suite 650 Altanta, GA 30328-3495 Phone: (678) 579-8388

Phone: (678) 579-838 Fax: (678) 320-9433

Email: <a href="mailto:cboone@covad.com">cboone@covad.com</a>

Florida Cable Telecommunications Assoc., Inc.

Michael A. Gross

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#### Florida Digital Network, Inc.

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Florida Public Telecommunications Assoc. Angela Green, General Counsel 2292 Wednesday Street Tallahassee, FL 32308-4334 Phone: 850-222-5050

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## NewSouth Communications Corp.

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