



allegiancetelecom,inc.

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January 10, 2002

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By Overnight Delivery

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399

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Re: Docket No. 011077-TP

Dear Ms. Bayo:

On behalf of Allegiance Telecom of Florida, Inc., enclosed for filing are an original and seven copies of its: (1) Petition to Intervene in the above-referenced docket; (2) request to name undersigned counsel as qualified representative accompanied by undersigned counsel's affidavit; and (3) comments regarding the priority of issues in Staff's December 20, 2001 memorandum.

Also enclosed are extra copies of these filing. Please date stamp the extra copies to reflect receipt and return them to me in the enclosed self-addressed stamped envelope. If there are questions concerning this matter, please contact me.

Very truly yours,

Morton J. Posner

Counsel for Allegiance Telecom of
Florida, Inc.

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ORIGINAL

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Generic Investigation into Whether)
Competitive Practices of Incumbent and) Docket No. 011077-TP
Alternative Local Exchange Carriers)
Comply with Section 364.01(4), Florida) Filed: January 11, 2002
Statutes)

**PETITION OF ALLEGIANCE TELECOM OF FLORIDA, INC
TO INTERVENE**

Allegiance Telecom of Florida, Inc. ("Allegiance"), pursuant to Rule 25-22.039, Florida Administrative Code, respectfully petitions to intervene in the above-captioned proceeding. In support of its Petition, Allegiance states as follows:

1. Allegiance is an alternative local exchange carrier ("ALEC") certificated in Docket No. 990883-TX. Its corporate headquarters is located at 9201 North Central Expressway, Dallas, Texas 75231.
2. As an ALEC, Allegiance has a substantial interest in ensuring that anticompetitive practices in the Florida telecommunications market are eliminated.
3. The rights and interests of Allegiance may be substantially affected by the actions the Commission may take in this proceeding.
4. No other party can adequately represent Allegiance's interests.

Wherefore, Allegiance respectfully requests that the Commission grant this Petition allowing Allegiance to participate fully as a party of record including, if

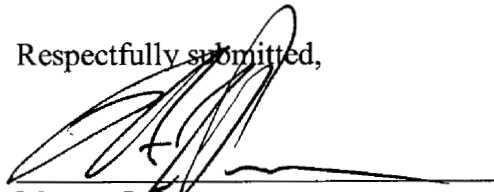
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appropriate, the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Morton J. Posner', written over a horizontal line.

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