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April 29, 2003

**VIA FEDERAL EXPRESS**

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


RE: Petition of MPower Communications, Corp. and Florida Digital Network  
for Expedited Temporary and Permanent Relief Against BellSouth  
Telecommunications, Inc. For Alleged Anticompetitive Conduct Regarding  
Florida Digital Network, Inc.'s Proposed Acquisition of Assets and  
Customer Base of MPower Communications, Corp.  
Docket No. 030301-TP

Dear Mrs. Bayo:

Enclosed please find the original and fifteen (15) copies of the Petition to  
Intervene for AT&T Communications of the Southern States, LLC and TCG South  
Florida, Inc. ("AT&T") in the above-referenced proceeding. Please stamp the extra copy  
and return to Lisa Riley in the enclosed envelope.

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

Sincerely,



Virginia C. Tate

Enclosures  
cc: All Parties of Record

DOCUMENT NUMBER-DATE

03933 APR 30 8

FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Petition to Intervene by AT&T Communications of the Southern States, LLC and TCG South Florida was served upon the parties of record by electronic mail and first-class, postage paid U.S. Mail.

This the 29<sup>th</sup> day of April, 2003.

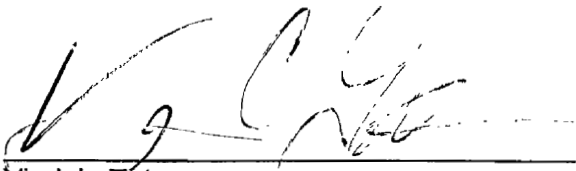
Wayne Knight, Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
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BellSouth Telecommunications, Inc.  
Nancy B. White/James Meza III  
c/o Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
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Mpower Communications Corp.  
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Virginia Tate

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition by Mpower Communications Corp. )  
and Florida Digital Network, Inc. for expedited ) Docket No. 030301-TP  
temporary and permanent relief against )  
BellSouth Telecommunications, Inc. for )  
alleged anticompetitive conduct regarding ) April 29, 2003  
Florida Digital Network Inc.'s proposed )  
acquisition of assets and customer base of )  
Mpower Communications Corp. )

**PETITION TO INTERVENE**

COMES NOW AT&T Communications of the Southern States, 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

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

Virginia Tate, Esq.  
Senior Attorney  
AT&T  
1200 Peachtree Street, NE  
Suite 8100  
Atlanta, GA 30309  
(404) 810-4922

Lisa A. Riley  
Docket Manager  
1200 Peachtree Street, NE  
Suite 8100  
Atlanta, GA 30309  
(404) 810-7812

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.



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