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October 2, 2003

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
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COMMISSION  
CLERK

Re: Docket No.: 030851-TP and 030852-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- 09568-03 ▶ The Florida Competitive Carriers Association's Petition to Intervene in Docket No. 030851-TP;
- 09569-03 ▶ The Florida Competitive Carriers Association's Petition to Intervene in Docket No. 030852-T;
- 09570-03 < ▶ The Florida Competitive Carriers Association's Opposition to Verizon Florida's Request for an Expedited "Trigger" Proceeding in Docket No. 030851-TP; and,
- ▶ The Florida Competitive Carriers Association's Opposition to Verizon Florida's Request for an Expedited "Trigger" Proceeding in Docket No. 030852-TP.

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Done 10/6/03

Ms. Blanca Bayo  
October 2, 2003  
Page 2

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

VGK/bae  
Enclosure

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission  
Triennial UNE review: Local Circuit Switching  
For Mass Market Customers

Docket No. 030851-TP

Filed: October 2, 2003

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**THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S**  
**PETITION TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Competitive Carriers Association (FCCA), through its undersigned counsel, submits its Petition to Intervene and states:

1. Copies of all pleadings, notices, and orders in this Docket should be provided to:

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter Reeves McGlothlin Davidson  
Kaufman & Arnold, PA  
117 South Gadsden Street  
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2. The FCCA is a Florida not-for-profit corporation, whose members provide competitive telecommunications services in the state. In this docket, the Commission will address the requirements of the Federal Communications Commission's (FCC) *Triennial Review Order (TRO)*. The members of the FCCA are a group of companies whose interests will be substantially affected by this Commission's interpretation of the FCC's *TRO*. Thus, the FCCA has standing to intervene in this proceeding.

3. Ultimate facts alleged include, but are not limited to, the fact the FCC's *TRO* must be interpreted and applied to facilitate local competition.

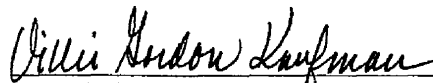
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FPSC-COMMISSION CLERK

4. Any determinations and actions in this docket regarding the *TRO* will affect the substantial interests of FCCA members as CLECs operating in Florida. Granting the FCCA leave to intervene in this docket will provide the Commission with greater insight into the correct interpretation and application of the *TRO*. The FCCA has standing under Chapter 120, Florida Statutes, and applicable rules to be granted intervention in this proceeding.

**WHEREFORE**, the Florida Competitive Carriers Association requests the Commission to enter an Order authorizing it to intervene as a full party to this proceeding.



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Attorneys for Florida Competitive Carriers  
Association

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Florida Competitive Carriers Association's Petition to Intervene has been provided by (\*) hand delivery or U.S. Mail this 2<sup>nd</sup> day of October 2003, to the following:

(\*) Beth Keating  
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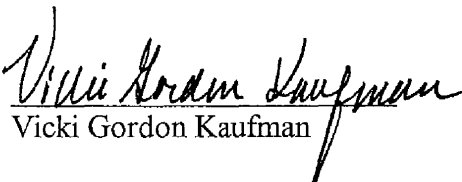
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Vicki Gordon Kaufman