

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: December 4, 2003

Z-TEL COMMUNICATIONS, INC.'S PETITION
FOR LEAVE TO INTERVENE

Pursuant to Rules 25-22.039 and 28-106.201(2), Florida Administrative Code, Z-Tel
Communications, Inc. ("Z-Tel") submits its Petition for Leave to Intervene in the above docket.

In support of its petition, Z-Tel states:

- 1. Petitioner's full name and principal business address:

Z-Tel Communications, Inc.
601 South Harbour Island Boulevard, Suite 220
Tampa, Florida 33602

- 2. All pleadings, orders, notices and other documents should be provided to the undersigned
and to:

Thomas M. Koutsky
Vice President, Law and Public Policy
Z-Tel Communications, Inc.
1200 19th Street, N. W. Suite 500
Washington, DC 20036

- 3. Statement of Substantial Interests: Z-Tel holds a CLEC Certificate issued by this
Commission that authorizes Z-Tel to provide competitive local exchange service in
Florida. Z-Tel offers such local exchange service within the Florida service areas of
BellSouth Telecommunications, Inc. and Verizon Florida, Inc. Z-Tel provides local
exchange service by utilizing unbundled network elements that it obtains from these
incumbent local exchange companies ("ILECs") pursuant to the rules and regulations
governing the availability and cost of such unbundled network elements promulgated by

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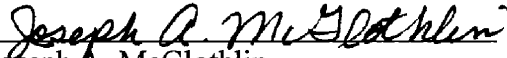
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the Federal Communications Commission (“FCC”) and overseen by this Commission. The Commission opened the above docket to implement the FCC’s Triennial Review Order (“TRO”). In this docket, the Commission will evaluate whether the ability of CLECs such as Z-Tel to offer competitive local exchange service would be impaired by the unavailability of the local switching network element that Z-Tel obtains from the ILECs. The Commission’s rulings in this docket will bear directly on whether Z-Tel will be able to continue to obtain the unbundled network elements on which it depends to provide competing local exchange service. The Commission’s decision in this docket will therefore directly affect Z-Tel’s substantial interests.

4. Statement of disputed facts: Z-Tel is not in a position to identify with precision the facts that will be disputed in this docket, but anticipates that ILECs will dispute the need for the continued availability of the unbundled local switching element.
5. Ultimate facts alleged: The ability of Z-Tel and other CLECs to provide competitive local exchange service in Florida would be severely impaired if the UNE-P platform were to become unavailable.

WHEREFORE, Z-Tel requests the Commission to issue an order authorizing it to participate as a full party in the above docket.


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Z-TEL Communications, Inc.'s Petition For Leave to Intervene has been provided by (*) hand delivery, (**) e mail, () U. S. Mail this 4th day of December 2003, to the following:

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