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Timolyn Henry\*\*\*\*\*1

**Timolyn Henry**

**From:** Sapper,Lisa A - LGCRP [lisariley@att.com]  
**Sent:** Monday, October 11, 2004 4:50 PM  
**To:** Sapper,Lisa A - LGCRP; Filings@psc.state.fl.us  
**Cc:** Beth Keating; Richard Chapkis; David Christian; chris.savage@crblaw.com; dfrappier@crblaw.com; Beth Salak  
**Subject:** Docket No. 041170 -- AT&T's Petition to Intervene



041170- ATT  
t to Intervene 1

In re: Complaint against Verizon Florida, Inc. and request for declaratory ruling by Bright House Networks Information Services, LLC (Florida) Docket No. 041170

Attached please find for electronic filing AT&T's Petition to Intervene in the above-referenced docket. The cover letter, certificate of service and AT&T's Petition a total of 5 pages. The attached document should be considered the official version for purposes of the docket file.

As indicated in the cover letter, copies of AT&T's Petition is being distributed to parties via electronic and U.S. Mail. Thank you for your assistance in this matter.

<<041170- ATT Pet to Intervene 10-11-04.doc>>

Lisa A. Sapper  
AT&T Law & Government Affairs  
Docket Manager - Florida  
Office: 404-460-7830  
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Tracy Hatch  
Senior Attorney  
Law and Government Affairs  
Southern Region

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101 N. Monroe Street  
Tallahassee, FL 32301  
850-425-6360

October 11, 2004

**BY ELECTRONIC FILING**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 041170-TP

Dear Ms. Bayó:

Attached please find AT&T's Petition to Intervene in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

*s/ Tracy W. Hatch*

Tracy W. Hatch

TWH/las  
Attachment  
cc: Parties of Record

DOCUMENT NUMBER-DATE

10974 OCT 11 8

FPSC-COMMISSION CLERK



Lisa A. Sapper  
Docket Manager  
1230 Peachtree Street, NE  
4<sup>th</sup> Floor  
Atlanta, GA 30309  
(404) 810-7812

3. AT&T is a telecommunications company that has been duly certificated by the Commission as a competitive local exchange telecommunications company ("CLEC") 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. AT&T provides local telephone service in Florida through various means including the offering of a local service utilizing voice-over-internet-protocol ("VOIP"). AT&T's VOIP product, like the local service provided by Bright House Networks Information Services, LLC, ("Bright House") described in its Complaint and Petition for Declaratory Ruling, requires the use of local telephone numbers. When a voice customer chooses the VOIP service offered by AT&T, that customer may wish to retain his current telephone number. Any delay or failure in the porting of local telephone numbers for customers subscribing to AT&T's local VOIP service will adversely affect AT&T's ability to offer its VOIP service. Accordingly, AT&T's substantial interests will be affected by any action that the Commission takes in this docket to address the issues raised by Bright House its Complaint and Petition for Declaratory Ruling.

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

*/s/ Tracy W. Hatch*

\_\_\_\_\_  
Tracy W. Hatch  
Senior Attorney  
AT&T  
101 N. Monroe Street  
Suite 700  
Tallahassee, FL 32301  
(850) 425-6360

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of AT&T's Petition for Intervention was served by electronic and U.S. Mail this 11th day of October 2004 to the following:

(\*) Blanca S. Bayo  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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