

ORIGINAL

Timolyn Henry

**From:** Ann Bassett [abassett@lawfla.com]  
**Sent:** Thursday, December 15, 2005 2:51 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket Nos. 050119-TP and 050125-TP  
**Attachments:** 2005-12-15, 050119 and 050125 T-Mobile Petition to Intervene.pdf

The person responsible for this electronic filing is:

Floyd R. Self  
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The Docket Nos. are 050119-TP - Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecom-munications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc.

and

050125-TP - Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC

This is being filed on behalf of T-Mobile USA, Inc.

Total Number of Pages is 6

T-Mobile USA, Inc.'s Petition to Intervene

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December 15, 2005

**ELECTRONIC FILING**

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

Re: Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of T-Mobile USA, Inc. is an electronic version of T-Mobile USA, Inc.'s Petition to Intervene in the above referenced dockets.

Thank you for your assistance with this filing.

Sincerely yours,

  
Floyd R. Self

FRS/amb  
Enclosure

DOCUMENT NUMBER-DAT

11655 DEC 15 08

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Joint petition by TDS Telecom d/b/a )  
TDS Telecom/Quincy Telephone; )  
ALLTEL Florida, Inc.; Northeast Florida )  
Telephone Company d/b/a NEFCOM; )  
GTC, Inc. d/b/a GT Com; Smart City )  
Telecommunications, LLC d/b/a Smart )  
City Telecom; ITS Telecommunications )  
Systems, Inc.; and Frontier Communications )  
of the South, LLC objecting to and requesting )  
suspension and cancellation of proposed transit )  
traffic service tariff filed by BellSouth )  
Telecommunications, Inc. )  
\_\_\_\_\_ )

Docket No. 050119-TP

Petition and complaint for suspension and )  
cancellation of Transit Traffic Service Tariff )  
No. FL2004-284 filed by BellSouth )  
Telecommunications, Inc., by AT&T )  
Communications of the Southern States, LLC )  
\_\_\_\_\_ )

Docket No. 050125-TP  
Filed: December 15, 2005

PETITION TO INTERVENE

T-MOBILE USA, INC. ("T-Mobile"), pursuant to Rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefore states:

1. T-Mobile is a Commercial Mobile Radio Service ("CMRS") provider licensed by the Federal Communications Commission to provide wireless communications services in Florida. Pursuant to Section 364.02(14)(c), Florida Statutes, T-Mobile is not a telecommunications company subject to the jurisdiction of this Commission.

2. T-Mobile's principal place of business is 60 Wells Avenue, Newton, Massachusetts 02459. Pleadings, orders, notices and other papers filed or served in this matter should be served upon:

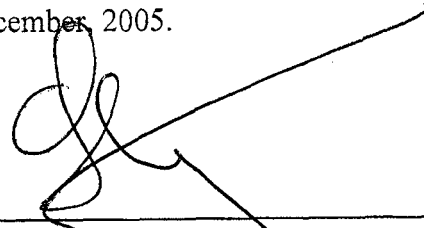
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3. T-Mobile has interconnection agreements with and otherwise exchanges land-to-mobile and mobile-to-land traffic with BellSouth and some of the other incumbent local exchange companies in Florida that are parties to this docket. The scope of this docket and the ultimate resolution of the issues set forth by the FPSC for consideration in this proceeding will have a direct and immediate impact on the ability T-Mobile to exchange traffic in Florida. As such, the resolution of the issues in this docket will affect the substantial interests of T-Mobile and its business operations in the State of Florida.

WHEREFORE, T-Mobile respectfully requests that the Commission grant T-Mobile leave to intervene for all purposes in this docket.

Respectfully submitted this 15<sup>th</sup> day of December, 2005.

A handwritten signature in black ink, appearing to be 'Floyd Self', written over a horizontal line.

Floyd Self, Esq.  
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and

Michele K. Thomas, Esq.  
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T-Mobile  
60 Wells Avenue  
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Attorneys for T-Mobile USA, Inc.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by electronic mail and/or U. S. Mail this 15<sup>th</sup> day of December, 2005

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