

ORIGINAL

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Sent: Friday, March 10, 2006 2:13 PM
To: Filings@psc.state.fl.us
Cc: Daubert, Todd; Kassman, Scott A.; JFUCCI@southernco.com; HHENDERS@southernco.com
Subject: Petition to Intervene, Docket Nos. ~~05119~~-TP, 050125-TP
Attachments: petintervene.doc 050119 - TP

On behalf of Southern Communications Services, Inc. d/b/a SouthernLINCWireless please find a Petition to Intervene (consisting of six pages, including service list) in the above-referenced dockets.

<<petintervene.doc>>

Theresa Baum
 On Behalf of Scott Kassman
 Kelley Drye & Warren, LLP
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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of 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, concerning BellSouth
Telecommunications, Inc.'s Transit Service
Tariff

Docket No. 050119-TP

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

Docket No. 050125-TP

Filed: March 10, 2006

SOUTHERN COMMUNICATIONS SERVICES, INC.'S PETITION TO INTERVENE

Southern Communications Services, Inc. d/b/a SouthernLINCWireless

("SouthernLINC"), through its undersigned counsel, pursuant to Rules 25-22.039 and 28-106.205 of the Florida Administrative Code, files its Petition to Intervene in this docket. As grounds therefore, SouthernLINC states:

1. The affected agency is the Florida Public Service Commission, 2450

Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

2. The name and address of the Petition is:

Southern Communications Services, Inc.
d/b/a SouthernLINCWireless
5555 Glenridge Connector, Suite 500
Atlanta, Georgia 30342

3. Copies of all pleadings, notices, and orders in these dockets should be

provided to:

DOCUMENT NUMBER-DATE

02082 MAR 10 8

Holly Henderson
Southern Communications Services, Inc.
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4. SouthernLINC is a commercial mobile radio service (“CMRS”) provider licensed by the Federal Communications Commission to operate in various parts of the State of Florida.

5. In these consolidated dockets, the Commission will consider the Transit Traffic Service Tariff filed by BellSouth Telecommunications, Inc. (BellSouth). Such action will directly affect SouthernLINC’s substantial interests. SouthernLINC’s interests are of the type this proceeding was designed to protect.

6. Disputed issues of material fact include, but are not limited to, whether the Commission should approve, modify or deny the BellSouth tariff; what compensation, if any, is appropriate under the tariff; if the tariff is approved, to whom should the tariff apply.

7. Ultimate facts include, but are not limited to, what tariff, if any should be approved by the Commission.

WHEREFORE, SouthernLINC requests that the Commission enter an order allowing it to intervene as a full party in this docket.

Respectfully submitted,

/s/ Holly Henderson

Holly Henderson

Southern Communications Services, Inc.

d/b/a SouthernLINCWireless

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CERTIFICATE OF SERVICE

I HERBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene was served via first-class United States mail this 10th day of March, 2006, to the following:

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