

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth
Telecommunications, Inc., pursuant to
Florida Statutes §364.051(4) to
Recover 2005 Tropical System
Related Costs and Expenses

Docket No. 060598-TL

Filed: September 12, 2006

**COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
PETITION TO INTERVENE**

The Competitive Carriers of the South, Inc. (CompSouth), pursuant to rule 25-22.039, Florida Administrative Code, file this Petition to Intervene in the above referenced docket. CompSouth requests that its petition be granted, that it be designated as a party of record, and that it be afforded all applicable rights under Florida law and under the rules and regulations of the Florida Public Service Commission (Commission).

As grounds therefore, CompSouth states:

1. Petitioner's principal place of business is:

Competitive Carriers of the South, Inc.
118 North Gadsden Street
Tallahassee, Florida 32301

2. All pleadings, orders, notices and other correspondence with respect to

this docket should be addressed to:

Vicki Gordon Kaufman
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118 North Gadsden Street
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3. CompSouth is a not-for-profit corporation whose members provide competitive telecommunications services in the State of Florida. In this docket, the Commission will address BellSouth Telecommunications, Inc.'s (BellSouth) request that it be permitted to recover a \$.50 per month surcharge assessed on basic and nonbasic

local exchange service lines and on all unbundled wholesale loop network element (UNE) customers. CompSouth members are a group of companies whose members include UNE customers of BellSouth and whose interests will be substantially affected by this Commission's action on BellSouth's request. Thus, CompSouth's members' substantial interests will be affected by this proceeding and CompSouth has standing to intervene.

4. Disputed issues of fact include, but are not limited to, whether it is appropriate to apply the requested surcharge to UNE customers.

5. Ultimate facts alleged include, but are not limited to, the fact that it is neither appropriate nor legal, pursuant to federal law, to apply BellSouth's proposed surcharge to UNE customers.

6. Any determinations and actions in this docket regarding BellSouth's surcharge request will affect the substantial interests of CompSouth members as CLECs operating in Florida. CompSouth has standing under Chapter 120, Florida Statutes, and applicable rules to be granted intervention in this proceeding.

WHEREFORE, CompSouth requests the Commission to enter an Order authorizing it to intervene as a full party to this proceeding.

s/ Vicki Gordon Kaufman
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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Petition to Intervene was furnished by (*) electronic mail and U.S. Mail this 12th day of September, 2006 to:

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S/ Vicki Gordon Kaufman
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