## AUSLEY & MCMULLEN

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March 21, 2008

VIA HAND DELIVERY

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Ms. Ann Cole, Commission Clerk Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: Petition for Declaratory Statement Regarding Local Exchange Telecommunications Network Emergency 911 Service by Intrado Communications, Inc. Docket No. 080089-TP.

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of the Petition for Leave to Intervene by Windstream Florida, Inc.

Please acknowledge receipt and filing of the above by stamping the duplicate of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

CMP <u>14</u>	
COM	Sincerely,
STR	$\mathcal{M}$
ECR	J. Jeffry Wahlen
GOL	J. Selly Wallen
OPC JJW/jh	
CC: Parties of Record	
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## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Petition for declaratory statement Regarding local exchange telecommunications Network emergency 911 service, by Intrado Communications, Inc

Docket No. 080089-TP March 21, 2008

## PETITION FOR LEAVE TO INTERVENE

Under Commission Rules 28-105.0027, 28-106.205 and 25-22.039, Windstream Florida, Inc. ("Windstream") asks the Commission to allow Windstream to intervene in this proceeding. Windstream is a telecommunications company as that term is defined in Section 364.02, Florida Statutes. As such, its regulated intrastate operations are subject to the jurisdiction of this Commission.

Communications related to this proceeding should be directed to:

J. Jeffry Wahlen	Bettye J. Willis
Ausley & McMullen	4001 Rodney Parham Road
Post Office Box 391	Mailstop: 1170-B1F03-53A
Tallahassee, FL 32302	Little Rock, Arkansas 72212
Phone: 850.425.5471	Phone: 501.748.5692
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Email: jwahlen@ausley.com	Email: <u>bettye.j.willis@windstream.com</u>

Intrado Communications, Inc. ("Intrado") filed a petition in this docket requesting that the Commission issue a declaratory statement concerning whether, among other things, Windstream may charge Intrado or Public Safety answering Points for certain 911 services under Windstream's Florida tariffs. Windstream is entitled to intervene in this proceeding because its interests as a local exchange telecommunications company will be substantially and directly affected by the decision in this docket.

DOCUMENT NO. DATE

 $\frac{02121-08}{\text{FPSC} - \text{COMMISSION CLERK}}$ 

Respectfully submitted this 21<sup>st</sup> day of March, 2008.

\_\*

WINDSTREAM FLORIDA, INC.

J. Jeffry Wahlen Ausley & McMullen, P.A. Post Office Box 391 Tallahassee, Florida 32302 Phone: 850.425.5471 Fax: 850.222-7560 jwahlen@ausley.com

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S.

Mail (or Hand Delivery\*) this 21<sup>st</sup> day of March, 2008 to the following:

Adam Teitzman\* Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ateitzma@psc.state.fl.us

Rebecca Ballesteros Associate Counsel Intrado Communications, Inc. 1601 Dry Creek Drive Longmont, CO 80503 Rebecca.ballesteros@intrado.com

Lisa S. Foshee J. Phillip Carver AT&T Southeast 675 West Peachtree Street, Suite 4300 Atlanta, GA 30375 j.carver@att.com Floyd R. Self Messer, Caparello & Self, P.A. 2618 Centennial Place Tallahassee, FL 32308 <u>fself@lawfla.com</u>

E. Earl Edenfield, Jr. Tracy W. Hatch Manuel A. Gurdian c/o Gregory R. Follensbee AT&T Florida 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 <u>Greg.follensbee@att.com</u>

Dulaney L. O'Roark III P. O. Box 110 MC FLTC0007 Tampa, FL 33601-0110 de.oroark@verizon.com

 $\frac{1}{1. \text{ Jeffry Wahlen}}$