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December 12, 2008

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

Re: Joint Petition for Cancellation of CLEC Certificate and Waiver of Rule 25-4.118,
Florida Administrative Code

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket on behalf of Level 3 Communications, LLC ("Level 3") and Looking Glass Networks, Inc. ("Looking Glass") are the original and fifteen copies of a Joint Petition for Cancellation of CLEC Certificate and Waiver of Rule 25-4.118, Florida Administrative Code.

Please acknowledge receipt of these documents by stamping the extra copy of this letter filed and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,

Marsha E. Rule

MER/rl
Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Joint Petition of Looking Glass)
Networks, Inc.)
and Level 3 Communications, LLC for a Waiver)
of Rule 2-4.118, Florida Administrative Code,)
and for Cancellation of Looking Glass)
Networks, Inc.'s CLEC Certificate)
_____)

Docket No. 080708

Filed: December 12, 2008

**JOINT PETITION FOR CANCELLATION OF CLEC CERTIFICATE
AND WAIVER OF RULE 25-4.118, FLORIDA ADMINISTRATIVE CODE**

Looking Glass Networks, Inc. ("LGN") and Level 3 Communications, LLC, ("Level 3"), pursuant to Rules 25-24.820 and 25-4.118, Florida Administrative Code, request cancellation of LGN's CLEC certificate, and a waiver of 25-4.118, Florida Administrative Code to allow transfer of LGN's customers to Level 3, its parent company. In support, the parties state as follows:

1. LGN is a facilities-based telecommunications company with authority to provide competitive local exchange telecommunications service in Florida.¹ LGN's address is 1025 Eldorado Blvd., Broomfield, CO 80021. Looking Glass Networks Holding Co., Inc. ("LGN Holding") is the parent company of LGN. Level 3 is the parent company of LGN Holding. Level 3 is a facilities-based telecommunications company that has authority to provide competitive local exchange telecommunications service and interexchange telecommunications service in Florida.² Level 3's address is 1025 Eldorado Blvd., Broomfield, CO 80021.

¹ LGN holds CLEC certificate No. 7587.

² Level 3 holds CLEC certificate No. 5725 and IXC registration No. TJ154.

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2. The name and address of LGN's and Level 3's representative in this proceeding

is:

Gregory T. Diamond
Regulatory Counsel, Southeast Region
Level 3 Communications
Broomfield, CO 80021
Tel: 720-888-3148
Fax: 720-888-5134
Email: greg.diamond@level3.com

3. For the past several years Level 3 has been integrating the networks and systems of its various subsidiaries, including LGN. As a result, the independent existence of many of Level 3 certificated subsidiaries has become *pro forma*. In order to streamline and better organize the business and operations of Level 3's various operating companies, the parties propose to transfer all of LGN's Florida customers to Level 3 and cancel LGN's Florida CLEC certificate.³

4. Rule 25-4.118, Florida Administrative Code prohibits changing a customer's telecommunications carrier without the customer's authorization. Rule 25-4.118 is applicable to CLECs pursuant to Rule 25-24.845. The Commission has authority to waive this requirement pursuant to Rule 25-24.455, Florida Administrative Code and Section 364.337(2) and (4), Florida Statutes. LGN seeks a waiver of Rule 25-4.118 so it will not have to obtain each customer's consent to the transfer from LGN to Level 3. Waiver of this requirement in the instant case is in the public interest because it will ensure a quick and easy transfer for customers while avoiding unnecessary service disruption or slamming complaints. LGN provides no presubscribed telecommunications service in Florida; it provides only private line service and collocation to 9 customers that are either carriers themselves or are medium to large enterprises.

³ The Commission recently approved a similar request by Level 3 and Progress Telecom, LLC, in Docket No. 080619-TP. See Order No. PSC-08-0805-PAA-TP, issued on December 4, 2008.

5. The transfer of customers from LGN to Level 3 will have no adverse impact on customers. The LGN customers will continue to receive their existing services over the same facilities and at the same rates, terms and conditions that they have prior to the transfer, and any future changes in the rates, terms and conditions of service will be made consistent with Commission requirements. The bills LGN customers currently receive already prominently identify LGN as a Level 3 company and, as such, the transfer will not cause customer confusion. Immediately following the transfer, existing customers will continue to receive service under the same billing system and the proposed transfer will not involve any interruption or discontinuation of service or customer terminations.

6. Level 3 will provide advance written notice to the affected customers at least thirty (30) days prior to the transfer to ensure a seamless transition and to avoid customer confusion or inconvenience. A copy of the notification letter is attached as Exhibit A.

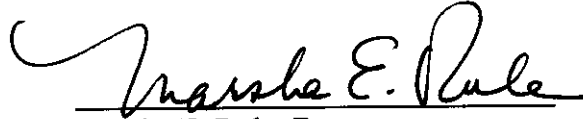
7. Level 3 will file amended tariffs or price lists to include all grandfathered legacy LGN services and all legacy LGN services that will continue to be marketed by Level 3. Customers transferred from LGN to Level 3 will not experience any change in their telecommunications services. The only change will be the identity of their new provider.

8. The proposed transfer is in the public interest. The transfer will be transparent to customers and will have no adverse impact. Existing LGN customers will be notified of the change and will receive the same services at the same rates, terms and conditions.

9. LGN will notify the Commission when customers have been transferred, and thereafter, will file its final Regulatory Assessment Return and pay its final Regulatory Assessment fees within 30 days of the Commission's final order canceling its CLEC certificate.

WHEREFORE, the parties request the Commission to (a) waive the requirements of Rule 25-4.118, Florida Administrative Code so that they may transfer LGN's customers to Level 3, and (b) after such customers have been transferred, to cancel LGN's CLEC certificate.

RESPECTFULLY SUBMITTED:

A handwritten signature in black ink, reading "Marsha E. Rule". The signature is written in a cursive style with a large initial "M".

Marsha E. Rule
Marsha E. Rule, Esq.
Rutledge, Ecenia & Purnell P.A.
P. O. Box 551
Tallahassee, Florida 32302
(850) 681-6788 (Telephone)
(850) 681-6515 (Facsimile)

Attorneys for LGN, LLC
and Level 3, LLC

EXHIBIT A

Looking Glass Networks/Level 3 Logos

Date

IMPORTANT NOTICE REGARDING YOUR SERVICES FROM LOOKING GLASS NETWORKS

Dear Looking Glass Networks Customer:

Through an affiliate, Level 3 Communications, LLC (Level 3) became the indirect parent company of Looking Glass Networks in _____. We are now pleased to announce that the services you receive from Looking Glass Networks will soon be provided directly by Level 3. As an existing customer, the only change you will see will be a change in the name of your provider from Looking Glass Networks to Level 3. Otherwise, your services will remain with the Level 3 family of companies.

You will continue to use the same services you currently do and, of course, there will be no fees or charges to you in connection with this transfer and there will be no disruption in service. As a Level 3 customer, you will continue to receive services at the same rates, terms and conditions specified in your existing contract with Looking Glass Networks or, if applicable, filed and/or posted tariffs and/or price lists.

Level 3 anticipates the date of the transfer will be _____, 2009, provided any necessary regulatory approvals have been obtained; and, at that time, the name of your service provider will become Level 3.

If you have any questions about the transfer or about Level 3 in general, please visit www.level3.com or call 800-____-____. For all questions regarding billing, repairs, service needs or complaints, please contact Level 3 at 800-____-____.

We look forward to continuing to provide service to you.

Cordially,

Level 3 Communications