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April 5, 1993

*RB*

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Mr. Steven Tribble  
Executive Director  
Florida Public Service Commission  
101 E. Gaines Street  
Tallahassee, FL 32399

~~92-1074-20~~

Re: Petition to Intervene - Docket No. 921047

Dear Mr. Tribble:

Enclosed please find an original and 15 copies of a Petition to Intervene on behalf of the Interexchange Access Coalition in the above-reference proceeding.

Also enclosed is a duplicate of this filing. Please date stamp the duplicate and return it to me in the enclosed self-addressed, stamped envelope.

Should any questions arise concerning this filing, please do not hesitate to contact me at the above-referenced number.

Sincerely,

*Rachel J. Rothstein*  
Rachel J. Rothstein

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- AFA
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DOCUMENT NUMBER-DATE  
03745 APR-6 83  
FPSC-RECORDS/REPORTING

**BEFORE THE  
STATE OF FLORIDA  
FLORIDA PUBLIC SERVICE COMMISSION**

Petition for Expanded )  
Interconnection for )  
Alternative Access Vendors )  
with Local Exchange Company )  
Central Offices by Intermedia )  
Communications of Florida, )  
Inc. )

921074-TP  
Docket No. 921047-TP

**PETITION TO INTERVENE**

The Interexchange Access Coalition ("IAC"), by its attorneys, respectfully requests leave to intervene in the above-captioned proceeding, which has been initiated to examine, among other things, the potential benefits and effects of expanded interconnection for both special and switched access. IAC requests leave to intervene because its members will be affected directly and substantially by the outcome of this proceeding.

IAC is an ad hoc group of nondominant interexchange carriers. IAC is comprised of the following companies: LDDS Communications, Inc., WilTel, Inc., Metromedia Communications Corp., Cable & Wireless, Inc., Litel Telecommunications Corp., and U.S. Long Distance, Inc. IAC includes at least five of the ten largest purchasers of access services in the nation. Indeed, as interexchange carriers, access charges represent the biggest single expense item for each of these companies. Therefore, the Commission's ruling in this proceeding will have a profound impact on each of IAC's members, as well as their customers.

DOCUMENT NUMBER-DATE

03745 APR-68

FPSC-RECORDS/REPORTING

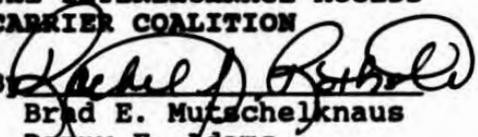
Furthermore, no prejudice will result from allowing IAC to intervene at this time. Indeed, the Commission's evaluations of the issues involved is still preliminary, with the initial workshop scheduled for April 8, 1993. Since Commission consideration of this issue is in the early stages, IAC's intervention and participation will not unduly delay the proceedings. Rather, IAC's members will be able to add unique insight to the Commission's deliberative process.

While IAC does intend to actively participate in this docket, it will not be able to attend the initial workshop due to a scheduling conflict. However, IAC does plan on attending future workshops, and is likely to file comments and testimony if appropriate.

WHEREFORE, the CCC respectfully requests leave to intervene and be treated as a party in these proceedings.

Respectfully submitted,

**THE INTEREXCHANGE ACCESS  
CARRIER COALITION**

By 

Brad E. Mutschelknaus  
Danny E. Adams  
Rachel J. Rothstein

of

**WILEY, REIN & FIELDING**  
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Washington, D.C. 20006  
(202)429-7000

Its Attorneys

April 5, 1993

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of April, 1993, I caused copies of the foregoing "Petition to Intervene" to be mailed via first-class postage prepaid mail to the following:

Lee Willis  
Ausley Law Firm  
P.O. Box 391  
Tallahassee, FL 32302  
(904) 222-7560

General Regulatory Manager  
Central Telephone Company  
P.O. Box 2214  
Tallahassee, FL 32316-2214

Beverly Menard  
Reg. Director - Reg.  
& Ind. Affairs  
GTE Florida Incorporated  
106 East College Avenue  
Suite 1440  
Tallahassee, FL 32301-7704  
(904) 224-3963

Intermedia Communications of  
Florida, Inc.  
9280 Bay Plaza Boulevard  
Suite 720  
Tampa, Florida 33619-4453

Marshall M. Criser, III  
Southern Bell Telephone  
& Telegraph Company  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301-1556

Patrick Wiggins  
Wiggins & Villacorta Law Firm  
P.O. Drawer 1657  
Tallahassee, FL 32302

*Sharen A. Kinney*  
Sharen A. Kinney