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Chan Bryant Abney Attorney, State Regulatory - South

VIA AIRBORNE

July 28, 1995

Ms. Blanca S. Bayó Director, Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> In Re: Investigation into Temporary Local Telephone Number Portability Solution to Implement Competition in Local Exchange Telephone Markets; Docket No. 550757 11

Dear Ms. Bayó:

Please find enclosed for filing, the original and 16 copies of Sprint Communications Company Limited Partnership's ("Sprint") Petition for Leave to Intervene in the above captioned proceeding. Please date stamp the additional copy and teturn to me in the enclosed self addressed stamped envelope. All parties of record have

ACK	been served in accordance with the atta		<u> </u>
AFA APP	Thank you in advance for your cooperation.		
CAF CMD CTR	Taylor	Sincerely,	Bryan Abner
EAG LEG LIT!	<u></u>	Chan Bryant A Attorney, State	Abney
CPO	_cc:_All Parties of Record		
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BEFORE THE



FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into

Temporary Local Telephone Number) Docket No.: 950737-TP

Portability Solution to Implement)

Competition in Local Exchange) Filed: July 31, 1995

Telephone Markets)

SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP PETITION FOR LEAVE TO INTERVENE

Sprint Communications Company Limited Partnership (hereinafter "Sprint") hereby petitions the Florida Public Service Commission ("Commission") for leave to intervene and participate as a party in the above-captioned proceeding pursuant to Rule 25-22.039, F.A.C. In support of its Petition, Sprint shows the following:

1. The complete name and address of the Petitioner is:

Sprint Communications Company Limited Partnership c/o Tony Key Director, State Regulatory - South 3100 Cumberland Circle - N0802 Atlanta, Georgia 30339

2. Petitioners request that all pleadings and other documents be served upon:

C. Everett Boyd, Jr.

Ervin, Varn, Jacobs, Odom & Ervin

305 S. Gadsden Street

P.O. Drawer 1170

Tallahassee, Florida 32302

State Regulatory - South
Sprint

3100 Cumberland Circle
Atlanta, Georgia 30339

3. Sprint is an authorized interexchange carrier in the state of Florida operating pursuant to a certificate of public convenience and necessity issued by the Florida Public Service Commission ("Commission"). Sprint currently provides interexchange DOCUMENT NUMBER-DATE

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telecommunication services to customers within the state of Florida.

- 4. The Commission has initiated a proceeding to investigate a temporary local telephone number portability solution to implement competition in local exchange telephone markets.
- 5. Sprint is currently a provider of telecommunications services and a competitor in the Florida interexchange long distance market. Sprint is also a potential competitor in the local exchange telephone market. Numbering resources is at issue in this docket and any change from the current structure will effect new entrants in the local exchange market.
- 6. Sprint respectfully submits that any action taken by the Commission in this proceeding may have a direct and material effect upon the legal rights, duties, privileges, immunities or other legal interests of Sprint. Sprint has a substantial interest in a Commission determination with respect to these interests which are not otherwise represented in this proceeding.
- 7. Sprint respectfully requests that it be granted leave to intervene and participate as a party of record in the above-captioned proceeding and that Sprint be given the right to fully participate in any hearing, present testimony, conduct crossexamination and to file briefs.

WHEREFORE, for the above stated reasons, Sprint prays:

- 1. That it be permitted to intervene in this proceeding and participate fully as a party of record.
- 2. That Petitioner have such other and further relief to which it may be entitled.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

BY:

Chan Bryant Abney

Attorney, State Regulatory - South 3100 Cumberland Circle - N0802 Atlanta, Georgia 30339 (404) 859-5146

and

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom & Ervin
305 S. Gadsden Street
P.O. Drawer 1170
Tallahassee, Florida 32302
(904) 224-9135

Its Attorneys

July 28, 1995

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing Petition for Leave to Intervene on behalf of Sprint Communications Company L.P. in Docket No. 950737-TP, via United States mail, postage paid and properly addressed to the following:

Vicki Gordon Kaufman McWhirter, Reeves, et al 315 S. Calhoun St. Suite 716 Tallahassee, FL 32301

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Angela Green FL Public Telecom Assn 125 S. Gasdsen St. Ste 200 Tallahassee, FL 32301

C. Everett Boyd Ervin, Varn, Jacobs, et al PO Drawer 1170 Tallahassee, FL 32302

Monte Belote FL Consulant Action Network 4100 W. Kennedy Blvd. #128 Tampa, FL 33609

This 28th day of July 1995.

Floyd Self Messers Vickers, et al PO Box 1876 Tallahassee, FL 32302-1876

Laura Wilson FL Cable Telecommunications 310 N. Monroe St. Tallahassee, FL 32302

Dan B. Hendrickson PO Box 1201 Tallahassee, FL 32302

Lisa Sammons
Sprint Communications Company
Limited Partnership