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Florida Cable Telecommunications Association

Steve Wilkerson, President

September 11, 1995

ORIGINAL
FILE ONLY

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No. 950985-TP

Dear Ms. Bayo:

ACK Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies of Florida
AEA _____ Cable Telecommunications Association, Inc.'s Petition for Leave to Intervene. Copies have been
AMP _____ served on the parties of record pursuant to the attached certificate of service.

CTF _____ Please acknowledge receipt and filing of the above by date stamping the duplicate copy of this
COC letter and returning the same to me.

CTF _____ Thank you for your assistance in processing this filing.

ETA _____ Yours very truly,

LM 5
COC 1 *Laura L. Wilson*
REG _____ Laura L. Wilson
SFC 1 _____ Regulatory Counsel

WLD _____ Enclosures
OTH *Dist Com*

c: All Parties of Record
Mr. Steven E. Wilkerson

[Handwritten signature]

DOCUMENT NUMBER-DATE
08904 SEP 11 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Unfiled
FILE COPY

Resolution of Petition(s) to establish)
non-discriminatory rates, terms and)
conditions for interconnection involving)
local exchange companies and alternative)
local exchange companies pursuant to)
Section 364.162, Florida Statutes)
_____)

DOCKET NO. 950985-TP

FILED: September 11, 1995

PETITION FOR LEAVE TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in the above-captioned proceeding. In support of this petition, FCTA states:

1. FCTA is a non-profit trade association representing the cable telecommunications industry in Florida. The FCTA's business address is 310 North Monroe Street, Tallahassee, FL 32301.

2. The names and addresses of the persons authorized to receive notices, pleadings and other communications in this docket are:

Laura L. Wilson, Esq.
Charles F. Dudley, Esq.
Florida Cable Telecommunications Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

3. This proceeding is designed to resolve issues relating to the establishment of non-discriminatory rates, terms and conditions for interconnection involving local exchange companies and alternative local exchange companies pursuant to Section 364.162, Florida Statutes.

4. On September 1, 1995, Teleport Communications Group ("TCG") petitioned the Commission to establish interconnection rates for the exchange of telephone traffic between TCG and BellSouth Telecommunications, Inc. ("BellSouth"). The new law requires that such BellSouth rates must be non-discriminatory. Section 364.163(3), Fla. Stat.

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5. The FCTA and its members are directly and substantially affected by the issues presented in this proceeding. TCG's investors are four cable companies who are also FCTA members: Cox Enterprises (Cox), Tele-Communications Inc. (TCI), Continental Cablevision (Continental) and Comcast Corporation (Comcast). TCG's inability to obtain fair interconnection rates and terms directly impacts its ability to provide economically viable local competition in Florida. This is directly injurious to the financial and business interests of Cox, TCI, Continental and Comcast.

6. Moreover, the Commission's decisions in this docket will directly and materially affect the ability of present and future alternative local exchange companies to effectively compete in BellSouth's Florida territory because the new law requires non-discriminatory rates to be established. All telecommunications service providers, present and future, wishing to compete with BellSouth have a direct interest at stake to ensure that compensation levels are economically viable and non-discriminatory.

7. It is generally recognized that cable companies are well-positioned to offer facilities-based competition to the local exchange companies given the correct legal, regulatory and economic incentives. Cable companies presently operating in BellSouth territory include Continental, Cox, Comcast and TCI. Moreover, many of the certificated AAVs, such as AlterNet and Teleport, providing competitive telecommunications services in Florida are either owned by or affiliated with cable companies. These AAVs compete in BellSouth territory today and are pursuing interconnection arrangements with BellSouth. The FCTA and its members, therefore, have a direct interest in ensuring that the Commission's decisions foster local exchange competition in BellSouth's territory and eliminate conditions that serve as a barrier to competition.

8. FCTA's participation will assist the Commission and serve the public interest by providing valuable information that will contribute to the development of a fair resolution to the issues presented.

WHEREFORE, for the reasons stated herein, FCTA respectfully requests that the Commission grant this Petition for Leave to Intervene and that FCTA be given all rights of a party to this proceeding.

Respectfully submitted,



Laura L. Wilson, Esq.
Charles F. Dudley, Esq.
Florida Cable Telecommunications Association, Inc.
310 North Monroe Street
Tallahassee, FL 32301
(904) 681-1990

CERTIFICATE OF SERVICE
DOCKET NO 950985-TP

I **HEREBY CERTIFY** that a true and correct copy of FCTA's Petition for Leave to Intervene has been furnished by Hand Delivery(*) and/or U.S. Mail on this 11th day of September, 1995 to the following parties of record:

Tracy Hatch*
Division of Legal Services
Florida Public Service Commission
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By: _____

Arund Wilson