

RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

FILE 024

STEPHEN A. ECENIA  
KENNETH A. HOFFMAN  
THOMAS W. KONRAD  
R. DAVID PRESCOTT  
HAROLD F. X. PURNELL  
GARY R. RUTLEDGE  
R. MICHAEL UNDERWOOD  
WILLIAM B. WILLINGHAM

POST OFFICE BOX 551, 32302-0551  
215 SOUTH MONROE STREET, SUITE 420  
TALLAHASSEE, FLORIDA 32301-1841

GOVERNMENTAL CONSULTANTS:  
PATRICK R. MALOY  
AMY J. YOUNG

TELEPHONE (904) 681-6788  
TELECOPIER (904) 681-6515

August 21, 1996

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center  
Room 110  
Tallahassee, Florida 32399-0850

Re: Docket No. 960100-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group, Inc./TCG of South Florida ("TCG") are the original and fifteen copies of TCG's Petition for Leave to Intervene.

Please acknowledge receipt of these documents by stamping then extra copy of this letter "filed" and returning same to me.

Thank you for your assistance with this filing.

Sincerely,

*Bill Willingham*  
William B. Willingham

WBW/emj  
Enclosure

cc: All Parties of Record

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08829 AUG 21 86

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic Investigation ) Docket No. 960100-TP  
into Permanent Number )  
Portability ) Filed: August 21, 1996  
\_\_\_\_\_)

TCG'S PETITION FOR LEAVE TO INTERVENE

Teleport Communications Group, Inc./TCG South Florida ("TCG"), by and through its undersigned counsel, and pursuant to Rules 25-22.036(7)(a) and 25-22.039, Florida Administrative Code, hereby requests that it be granted intervention with full party rights in the above referenced proceeding. In support of its Petition for Leave to Intervene, TCG states as follows:

- 1. The name and address of Petitioner:

Teleport Communications Group, Inc.  
Two Teleport Drive  
Staten Island, New York 10311-1004

- 2. All notices, pleadings, orders, staff recommendations, correspondence and other documents issued or served in this proceeding should be served on the following individuals on behalf of TCG:

Fredrik Cederqvist, Esq.  
Two Teleport Drive, Third Floor  
Staten Island, N.Y. 10311-1004  
(718)355-4657

Kenneth A. Hoffman, Esq.  
William B. Willingham, Esq.  
Post Office Box 551  
Tallahassee, FL 32302-0551  
(904)681-6788

- 3. TCG is a certificated alternative local exchange telecommunications company authorized to provide local telecommunications services in Florida.

- 4. This docket affects TCG's substantial interest, since the proceedings in this docket will determine the terms and conditions on which permanent number portability will be provided

DOCUMENT NUMBER-DATE

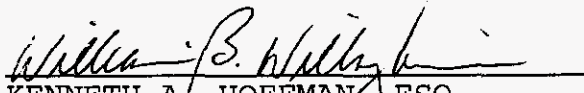
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FPSC-RECORDS/REPORTING

to TCG and to other alternative local exchange telecommunications companies.

5. At this time TCG is not aware of any disputed issues of material fact.

WHEREFORE, TCG respectfully requests that it be granted permission to intervene with full party rights in this proceeding.

  
KENNETH A. HOFFMAN, ESQ.  
WILLIAM B. WILLINGHAM, ESQ.  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
Post Office Box 551  
Tallahassee, FL 32302-0551  
(904) 681-6788

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U.S. Mail to the following this 21st day of August 1996.

Ms. Doris M. Franklin  
AT&T Communications of Southern  
States, Inc.  
101 North Monroe St., Ste. 700  
Tallahassee, FL 32301-1549

Mark Logan  
Bryant Law Firm  
201 S. Monroe St., Ste. 500  
Tallahassee, FL 32301-1549

Patrick K. Wiggins  
Marsha E. Rule  
Wiggins Law Firm  
P.O. Drawer 1657  
Tallahassee, FL 32302

Nancy H. Sims  
Bellsouth Telecommunications  
150 S. Monroe St., Ste. 400  
Tallahassee, FL 32301-1556

C. Everett Boyd, Jr.  
Ervin Law Firm  
300 S. Gadsden Street  
Tallahassee, FL 32301

Laura Wilson  
Florida Cable  
Telecommunications  
310 N. Monroe Street  
Tallahassee, FL 32301

Ms. Beverly Y. Menard  
c/o Mr. Ken N. Waters  
GTE Florida Incorporated  
106 East College Avenue, Ste. 1440  
Tallahassee, FL 32301-7704

Richard Melson  
Hopping Law Firm  
P.O. Box 6526  
Tallahassee, FL 32314

William Higgins  
AT&T Wireless Services  
250 Australian Avenue  
West Palm Beach, FL 33401

Martha McMillin  
MCI Telecommunications Corp.  
780 Johnson Ferry Road, Ste. 700  
Atlanta, GA 30342

Robin D. Dunson  
AT&T  
Promenade I, Room 4038  
Peachtree St., N.E.  
Atlanta, GA 30309

Ms. Patricia Kurlin  
Intermedia Communications of  
Florida, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619-4453

Floyd R. Self  
Messer Law Firm  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Mr. Tony H. Key  
Sprint  
3100 Cumberland Circle, #802  
Atlanta, GA 30339

  
KENNETH A. HOFFMAN

I:\USERS\ROXANNE\TCG.PTI