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January 14, 1997

GOVERNMENTAL CONSULTANTS: PATRICK R. MALOY AMY J. YOUNG



HAND DELIVERY

Ms. Blanca S. 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. 960786-TP

Dear Ms. Bayo:

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

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

Thank you for your assistance with this filing.

Sincerely,

Hoffman

ACK _____ AFA ____KAH/rl AFP All Parties of Record : 1.3 CMI CTR _ FA **RECEIVED & FILED** LEG EIN OPC _ FPSC-BUREAU OF RECORDS RCH _ SEC _ WAS OTH C

DOCUMENT NUMBER-DATE

00484 JAN 145 FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



In re: Consideration of BellSouth) Telecommunications, Inc.'s entry) into interLATA services pursuant) to Section 271 of the Federal) Telecommunications Act of 1996.)

Docket No. 960786-TP Filed: January 14, 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 Rule 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 is:

Teleport Communications Group Inc., TCG - Washington 2 Lafayette Centre 1133 Twenty First Street, N.W. Suite 400 Washington, D.C. 20036 (202) 739-0030 (telephone) (202) 739-0044 (fax)

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:

Kenneth A. Hoffman, Esq. William B. Willingham, Esq. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, FL 32302 (904) 681-6788 (telephone) (904) 681-6515 (fax) Mr. Paul Kouroupas TCG - Washington 2 Lafayette Centre 1133 Twenty First Street, N.W. Suite 400 Washington, D.C. 20036 (202) 739-0030 (telephone) (202) 739-0044 (fax) DOCUMENT NUMBER-DATE

00484 JAN 145

FPSC-RECORDS/REPORTING

3. Pursuant to the Telecommunications Act of 1996 (the "Act"), BellSouth Telecommunications, Inc. ("BellSouth") may not enter Florida's interLATA market until such time as the Federal Communications Commission ("FCC") determines that the conditions set forth in Section 271(c) and (d) and 272 of the Act have been satisfied.

4. Subsection 271(d)(2)(B) requires the FCC to consult with the Florida Public Service Commission ("Commission") prior to making a determination as to whether BellSouth has satisfied the conditions set forth in Section 271 of the Act. This docket was opened in anticipation of BellSouth's filing with the FCC seeking permission to enter Florida's interLATA market.

5. TCG is certificated by the Commission as an alternative local exchange telecommunications company and an interexchange carrier. TCG's substantial interests will be affected by the action that the Commission takes in this docket. TCG is authorized to provide and does provide local exchange and interexchange telecommunications services in Florida. BellSouth's entry into Florida's interLATA market will substantially affect TCG's ability to compete in Florida's telecommunications market.

6. The disputed issues of material fact in this proceeding include, but are not limited to, whether, upon the filing of its petition with the FCC, BellSouth meets the conditions set forth in Section 271 of the Act.

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

KENNETH A. HOFFMAN, ESQ. WILLIAM B. WILLINGHAM, ESQ. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, FL 32302 (904) 681-6788 (telephone) (904) 681-6515 (fax)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing TCG's Petition for Leave to Intervene was furnished by U. S. Mail to the following this <u>///</u> day of January, 1997:

Ms. Doris M. Franklin AT&T 101 N. Monroe Street Suite 700 Tallahassee, FL 32301-1549

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K HOFFMAN, ESQ.

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