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117 S. GADSDEN
TALLAHASSEE, FLORIDA 32301
TELEPHONE (850) 222-2525
FAX (850) 222-5606

December 2, 1997

HAND DELIVERED

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Docket Nos. 870248-TL, 870790-TL, 900039-TL,
910022-TL, 910528-TL, 910529-TL, 911185-TL &
921193-TL

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of the Florida Competitive Carriers Association's Petition to Intervene in the above dockets.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Sincerely,

ACK _____
AFA _____
APP _____
CAE _____
CMV VGK/pw
EMcls.
CTR _____
ENG _____
LEC 1
LIV 5
OFF _____
RIF _____
SEC 1
WAS _____
OTH Org Don

Vicki Gordon Kaufman
Vicki Gordon Kaufman

RECEIVED & FILED
DEC 2 1997
DIVISION OF RECORDS & REPORTING

DOCUMENT NUMBER-DATE
12223 DEC-25
FPSC-RECORDS & REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution by Holmes County)
County Board of County Commissioners)
for Extended Area Service in Holmes)
County.)

Docket No. 870248-TL

In Re: Request by Gilchrist County)
Commissioners for Extended Area Service)
Throughout Gilchrist County.)

Docket No. 870790-TL

In Re: Resolution by the Orange County)
Board of County Commissioners for)
Extended Area Service Between the)
Mount Dora Exchange and the Apopka,)
Orlando, Winter Garden, Winter Park,)
East Orange, Reedy Creek, Windermere,)
and Lake Buena Vista Exchanges.)

Docket No. 900039-TL

In Re: Resolution by Bradford County)
Commission Requesting Extended Area)
Service Within Bradford County and)
Between Bradford County, Union County)
and Gainesville.)

Docket No. 910022-TL

In Re: Request by Putnam County Board)
of County Commissioners for Extended)
Service Between the Crescent City,)
Hawthorne, Orange Springs, and Melrose)
Exchanges, and the Palatka Exchange.)

Docket No. 910528-TL

In Re: Request by Pasco County Board of)
County Commissioners for Extended Service)
Between All Pasco County Exchanges.)

Docket No. 910529-TL

In Re: Request for Extended Area Service)
Between All Exchanges Within Volusia)
County by Volusia County Council.)

Docket No. 911185-TL

In Re: Resolution by the Palm Beach)
County Board of County Commissioners)
for Extended Area Service Between All)
Exchanges in Palm Beach County.)
_____)

Docket No. 921193-TL

Filed: December 2, 1997

**THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S
PETITION TO INTERVENE**

The Florida Competitive Carriers Association (FCCA), pursuant to rule 25-22.039, Florida Administrative Code, files its Petition to Intervene. As grounds therefore, FCCA states:

1. All notices, pleadings and correspondence should be sent to:

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

2. FCCA is an industry association of carriers who are authorized to provide intraLATA and interLATA services in the state of Florida. FCCA's business address is:

Florida Competitive Carriers Association
Post Office Box 10967
Tallahassee, Florida 32302

FCCA'S Substantial Interests

3. FCCA's substantial interests will be affected by the action which the Commission takes in these dockets because its members are current providers of interLATA services.

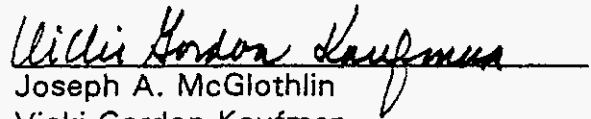
4. In these dockets, the Commission will determine the feasibility of one-way ECS. FCCA members currently carry interLATA traffic on these routes.

5. It is FCCA's understanding that in the course of these proceedings, the Commission will determine what price carriers will pay for originating and terminating calls on these routes.

6. It is the FCCA's position that if one-way ECS is approved on any of the routes in question, all carriers must be charged and pay the same price to originate and terminate such calls. Only if all carriers are charged the same price to originate and terminate these calls, will the pricing be in compliance with both state and federal requirements prohibiting discrimination among carriers.

7. FCCA has a substantial interest in these dockets in ensuring nondiscriminatory pricing on these routes.

WHEREFORE, FCCA requests that it be permitted to intervene in these dockets and participate as a full party.


Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525

Attorneys for the Florida Competitive
Carriers Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of FCCA's foregoing Petition to Intervene has been furnished by U.S. Mail or hand delivery (*) to each of the following parties this 2nd day of December, 1997:

Mary Beth Keating*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Nancy B. White
BellSouth Telecommunications, Inc.
Museum Tower Building, Suite 1910
150 West Flagler Street
Miami, Florida 33130

Jeffry Wahlen
Ausley & McMullen
227 South Calhoun Street (32301)
Post Office Box 391
Tallahassee, Florida 32302

Holmes County Board of Commissioners
210 North Oklahoma Street
Bonifay, Florida 32425

Marsha Rule
AT&T Communications of the Southern
States, Inc.
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301-1549

Burt & Lancaster
114 East First Street
Trenton, Florida 32693

Assistant County Attorney
Palm Beach County Board of Commissioners
Post Office Box 1989
West Palm Beach, Florida 33402

Orange County Board of Commissioners
Post Office Box 1393
Orlando, Florida 32802-1393

Vista United Telecommunications, Inc.
Post Office Box 10180
Lake Buena Vista, Florida 32830

Starke-Bradford Counties Chamber of
Commerce
Post Office Box 576
Starke, Florida 32091

David Erwin
Young Law Firm
Post Office Box 1833
Tallahassee, Florida 32302-1833

Kimberly Caswell
GTE Florida Incorporated
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110

Pasco County Board of Commissioners
30853 Live Oak Avenue
Dade City, Florida 33525

Volusia County Communications Director
119 West Indiana Avenue
DeLand, Florida 32720


Vicki Gordon Kaufman