



GTE Florida Incorporated

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December 15, 1997

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0650

Re: **Docket No. 971604-TP**
Request for approval of merger of MCI Communications Corporation (Holder of AAV/ALEC Certificate 2986 in the name MCI Metro Access Transmission Services, Inc.; and IXC Certificate 61, PATS Certificate 3080, and AAV/ALEC Certificate 3996 in the name MCI Telecommunications Corporation) with TC Investments Corp., a Wholly-Owned Subsidiary of WorldCom, Inc.

ACK Dear Ms. Bayo:
AFA _____
APP _____ Please find enclosed for filing in the above matter an original and fifteen copies of a
CAF _____ Petition to Intervene on behalf of GTE Corporation and GTE Communications
CMU _____ Corporation. Service has been made as indicated on the Certificate of Service. If
CTR _____ there are any questions regarding this matter, please contact me at (813) 483-2617.

EAC _____ Very truly yours,
LEA _____ *Anthony P. Gillman*
LHJ _____
OJ _____ Kimberly Caswell

FR _____
SH _____ KC:tas
WAL _____ Enclosures

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DOCUMENT NUMBER-DATE
12797 DEC 15 97
FPC-RECORDS/REPORTING

OTH _____
A part of GTE Corporation

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for approval of merger of MCI)
Communications Corporation (Holder of)
AAV/ALEC Certificate 2986 in the name MCI)
Metro Access Transmission Services, Inc.; and)
IXC Certificate 61, PATS Certificate 3080, and)
AAV/ALEC Certificate 3986 in the name MCI)
Telecommunications Corporation) with)
TC Investments Corp., a Wholly-Owned)
Subsidiary of WorldCom, Inc.)

Docket No. 971604-TP
Filed: December 15, 1997

PETITION TO INTERVENE

Pursuant to Commission Rule 25-22.039, GTE Corporation and GTE Communications Corporation (collectively, "GTE") ask the Commission to allow them to intervene in this proceeding. In support of this Petition, GTE states as follows:

1. GTE Corporation is a New York corporation and owns all of the issued and outstanding common stock of GTE Communications Corporation, a Delaware corporation. GTE Communications Corporation is an alternative local exchange carrier (ALEC), as defined by Florida Statutes, section 364.02(1). This Commission has granted it certificates to operate as both an ALEC and an interexchange carrier (specifically, a switchless rebiller and prepaid debit card provider). GTE Communications Corporation purchases unbranded basic long-distance service from WorldCom and resells this service to end users under the GTE brand name.

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2. **Communications regarding this proceeding should be directed to:**

**Kimberly Caswell
Anthony P. Gillman
P. O. Box 110, FLTC0007
Telephone: (813) 483-2617**

3. **By letters dated October 16, 1997 and October 23, 1997, WorldCom, Inc. ("WorldCom") asked this Commission to approve its proposed transfer of control of MCI Communications Corporation ("MCI") to WorldCom. The Commission opened Docket 971375-TP to review WorldCom's request.**

4. **On November 25, 1997, WorldCom filed a motion to withdraw its application for approval of the transfer of control. Also on November 25, WorldCom and MCI filed a joint application for approval of the planned WorldCom/MCI merger. The Docket caption was then changed to accommodate this amended application, but the Docket number remained the same. While GTEFL has received no formal notice of any Docket change, it now appears that Docket 971375-TP will be closed and that a new Docket number (971604-TP) has been assigned to the amended application.**

5. **GTE has a substantial interest in this case that cannot be adequately represented by any other party. In support of the contemplated transfer of control, WorldCom and MCI state (at pages 3-4 of their Nov. 25 application):**

The proposed Merger is in the public interest because, combined, the two companies will accelerate competition—especially in local markets—by creating a company with the capital, marketing abilities, and state-of-the-art network to compete against incumbent carriers. The competitive benefits of the proposed Merger, particularly for local, interexchange, and international services, are substantial....By creating a more effective and multi-faceted carrier in the local exchange sector, the proposed merger will significantly enhance competitive choice for U.S. telecommunications customers, including in the State of Florida.

GTE Communications Corporation is actively involved in the markets WorldCom and MCI described in their application. GTE Communications Corporation is, moreover, a substantial customer of WorldCom; WorldCom is the principal supplier of the long-distance capacity that GTE Communications Corporation resells. Therefore, GTE Communications Corporation necessarily has a substantial interest and right to participate in this case and specifically, in the evaluation of whether the proposed acquisition is likely to yield the public interest benefits WorldCom and MCI claim it will. To this end, MCI and WorldCom are the number two and number four facilities-based long-distance carriers, respectively, and a WorldCom/MCI merger would significantly reduce competition in the Florida long-distance market. In addition, because WorldCom and MCI currently compete head-to-head in providing facilities-based local exchange service in a number of major urban areas in Florida, including Orlando and Miami, the proposed merger would eliminate an actual competitor and frustrate the progress of local exchange competition in Florida.

6. For all the reasons discussed above, GTE requests intervention in this proceeding.


Respectfully submitted on December 15, 1997.

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GTE Communications Corporation

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Petition to Intervene on behalf of GTE Corporation and GTE Communications Corporation in Docket No. 971604-TP were sent via U.S. mail on December 15, 1997, to the parties on the attached list.

for Anthony P. Sullivan
Kimberly Caswell

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