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July 6, 1998

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
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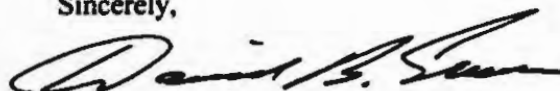
Re: Docket No. 980733-TL

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of ITS Telecommunications Systems, Inc.'s Petition for Leave to Intervene, which we ask that you file in the captioned matter.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



David B. Erwin

DBE:jm

Copy to: All parties of record
Robert M. Post, Jr.

- ACK _____
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FLORIDA PUBLIC SERVICE COMMISSION

**CERTIFICATE OF SERVICE
DOCKET NO. 980733-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 6th day of July, 1998 to the following:

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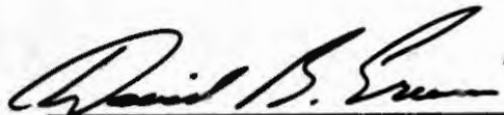
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David B. Erwin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair)
& Reasonable Residential Basic)
Local Telecommunications Rates)
in Special Project 980000A-SP)
_____)

Docket No. 980733-TL

Filed: July 6, 1998

PETITION TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, ITS Telecommunications Systems, Inc. (ITS) petitions the Florida Public Service Commission (FPSC) for leave to intervene in this docket, and says:

1. ITS is a "telecommunications company" within the meaning of Section 364.02, Florida Statutes. As such, its regulated intrastate operations are subject to the jurisdiction of the Florida Public Service Commission.
2. All pleadings, orders, notices, and other papers filed or served in this docket should be served on ITS at the following addresses:

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3. ITS acknowledges that this docket is intended to address discovery issues that may arise in connection with the Commission's Special Project number 980000A-SP. ITS has already been served discovery, so ITS must be part of this docket.

WHEREFORE, ITS respectfully requests that it be allowed to intervene in this docket.

DATED this 6th day of July, 1998.

A handwritten signature in black ink, appearing to read "David B. Erwin", written over a horizontal line.

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