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July 13, 1998

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RECORDS AND REPORTING

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. 980696-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc. and TCG 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 the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

RECEIVED & FILED

Sincerely,

FPSC-BUREAU OF RECORDS

*Kenneth A. Hoffman*  
Kenneth A. Hoffman

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KAH/rl  
Enclosures  
cc: Parties of Record  
Trib 3

DOCUMENT NUMBER DATE  
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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of Basic )  
 Local Telecommunications Service, )  
 pursuant to Section 364.025, Florida )  
 Statutes. )  
 \_\_\_\_\_ )

Docket No. 980696-TP

Filed: July 13, 1998

**PETITION FOR LEAVE TO INTERVENE**

Teleport Communications Group Inc. and its Florida affiliate, TCG South Florida (collectively "TCG"), hereby files this Petition for Leave to Intervene in this docket, and as grounds would show:

1. The name and address of Petitioner is:

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

TCG South Florida  
 1 East Broward Boulevard  
 Suite 910  
 Fort Lauderdale, FL 33301  
 (954) 453-4200 (telephone)  
 (954) 453-4444 (telecopier)

2. All notices, orders, pleadings and discovery and correspondence in this proceeding

should be provided to:

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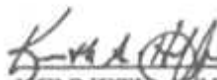
3. TCG is a certified alternative local exchange company providing local telecommunications services in Florida.

4. The purpose of this proceeding is to study and report to the Legislature on the forward-looking cost of providing basic local exchange telecommunications service pursuant to Section 364.025, Florida Statutes. The outcome of this proceeding is clearly intended to assist the Legislature should the Legislature decide to establish an intrastate universal service fund. The proxy cost model adopted and determinations made by the Commission in this proceeding are intended to assist the Legislature in the event the Legislature chooses to establish a permanent intrastate universal service mechanism and could constitute the initial step in the calculation of the size of any such fund.

5. As an alternative local exchange telecommunications company certificated to provide local telecommunications services in Florida, TCG's substantial interests are directly and materially affected by the matters at issue in this proceeding, the ultimate report issued by the Commission as a result of this proceeding, and any action taken by the Legislature in reliance on the Commission's report.

WHEREFORE, for the foregoing reasons, TCG respectfully requests that the Commission grant its Petition for Leave to Intervene and afford TCG full party status in the proceeding.

Respectfully submitted,



KENNETH A. HOFFMAN, ESQ.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 13th day of July, 1998:

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