



ORIGINAL

James D. Earl  
Assistant General Counsel

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Monday, November 16, 1998

**VIA Federal Express**

Ms Blanca Bayo, Director  
Divisions of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

RE: Docket 980948-TL

Dear Ms Bayo:

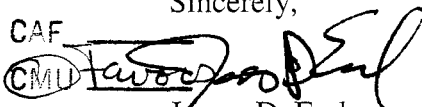
Enclosed for filing in the above captioned docket are an original and fifteen copies of Covad Communications Inc.'s Petition to Intervene.

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

Thank you for your assistance.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG  Enclosures
- LIN \_\_\_\_\_ Cc: Parties of Record
- OPC \_\_\_\_\_
- ROH \_\_\_\_\_
- SEC  \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely,

  
James D. Earl

DOCUMENT NUMBER-DATE

12866 NOV 17 98

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, Inc.'s, )
)
Petition for temporary waiver of physical, )
)
collocation requirements set forth in the 1996, )
)
Telecommunications Act and the FCC's First, )
)
Report and Order, for the Miami Palmetto )
)
Central, Office )
)

Case No.: Docket No. 980948-TL
Filed: November 17, 1998

PETITION TO INTERVENE

Covad Communications Inc. d/b/a/ DIECA Communications ("Covad"), hereby files this
Petition to Intervene in this docket and as grounds would show:

1. The name and address of the petitioner is:

Covad Communications Inc.
2300 Central Expressway
Building B
Santa Clara CA 95050

2. Copies of notices, pleadings and documents in this proceeding should be provided to:

James D. Earl, Esq.
Covad Communications Inc.
6849 Old Dominion Dr.
Suite 220
McLean, VA 22101
Tel: 703 734 6221
Fax: 703 734 5474

3. Covad is a certified alternative local exchange carrier in Florida.

4. Covad has requested physical collocation with Bell South, and has been denied
(verbally) collocation at the BellSouth central office that is the subject of this docket.

DOCUMENT NUMBER-DATE

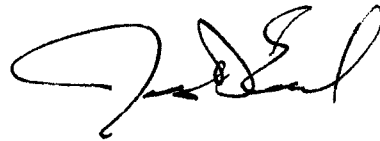
12866 NOV 17 88

FPSC-RECORDS/REPORTING

Accordingly, the substantial interests of Covad will be determined by this Commission in ruling on this petition.

WHEREFORE, Covad respectfully requests that the Commission grant this request to intervene.

Respectfully submitted

A handwritten signature in black ink, appearing to read "James D Earl", written in a cursive style.

James D Earl  
Assistant General Counsel  
Covad Communications  
6849 Old Dominion Dr.  
Suite 220  
McClean, VA 22101  
(703) 734-6221

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Covad's Petition to Intervene in Docket 980948-TL has been furnished by Federal Express to the following parties of record this 16<sup>th</sup> day of November, 1998.

Parties of Record and Interested Persons in Docket 980948:

\*

BellSouth Telecommunications, Inc.  
Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
Phone: (850) 224-7798  
Fax: 222-8640

\*

e.spire Communications, Inc.  
James C. Falvey, Esq.  
133 National Buisness Parkway, # 200  
Annapolis Junction, MD 20701  
Phone: (301) 361-4298  
Fax: (301) 361-4277

Represented by: Messer Law Firm

\*

Intermedia Communications, Inc.  
Mr. Steven Brown  
3625 Queen Palm Drive  
Tampa, FL 33619-1309  
Phone: (813) 829-2231  
Fax: (813) 829-7729  
EMail: STBrown@Intermedia.com

Represented by: Wiggins Law Firm

\*

Messer Law Firm  
Floyd Self  
P.O. Box 1876  
Tallahassee, FL 32302  
Phone: 850-222-0720  
Fax: 224-4359

Represents: WorldCom Technologies, Inc.

\*

Messer Law Firm

Norman Horton  
P.O. Box 1876  
Tallahassee, FL 32302  
Phone: 850-222-0720  
Fax: 224-4359

Represents: e.spire

Sprint  
Monica Barone  
3100 Cumberland Circle, #802  
Atlanta, GA 30339  
Phone: 404-649-5144  
Fax: 404-649-5174

\*

Suzanne F. Summerlin, Esq.  
1811-B Paul Russell Rd, Ste 201  
Tallahassee, FL 32301  
Phone: (850) 656-2288  
Fax: 656-5589

\*

Supra Telecommunications and Information Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133-3001  
Phone: (305) 476-4220  
Fax: (305) 476-4282  
EMail: kayramos@stis.com

\*

TCG South Florida  
c/o Rutledge Law Firm  
Kenneth Hoffman  
P.O. Box 551  
Tallahassee, FL 32302-0551  
Phone: 850-681-6788  
Fax: 681-6515

\*

Wiggins Law Firm  
Donna Canzano/Patrick Wiggins  
P.O. Drawer 1657  
Tallahassee, FL 32302  
Phone: 850-385-6007  
Fax: 385-6008


Represents: Intermedia Communications Inc.

\*

WorldCom Technologies, Inc.

Mr. Brian Sulmonetti  
1515 South Federal Highway, Suite 400  
Boca Raton, FL 33432-7404  
Phone: (561) 750-2940  
Fax: (561) 750-2629

Represented by: Messer Law Firm



James D. Earl