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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Petition to review and to cancel BellSouth Telecommunications, Inc.'s promotional tariff (T-98-1783) by Arrow Communications, Inc.

DOCKET NO. 990043-TP FILED: 1-29-99 RECORDS AND REPORTING

PETITION TO INTERVENE

Intermedia Communications Inc., (Intermedia), through its undersigned counsel, herewith files this Petition to Intervene in this docket and as grounds would show:

- 1. The name and address of the petitioner is:

Intermedia Communications Inc. 3625 Queen Palm Drive Tampa, Florida 33619-1309

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

Charles J. Pellegrini Wiggins & Villacorta, P.A. 2145 Delta Boulevard, Suite 200 Post Office Drawer 1657 Tallahassee, Florida 32302 (850) 385-6007

Steve Brown Intermedia Communications Inc. 3625 Queen Palm Drive Tampa, Florida 33610-1309 (813) 829-0011

- 3. Intermedia is a certificated Alternative Local Exchange Carrier (ALEC) providing telecommunications services in Florida.

Intermedia is a party to an Interconnection Agreement with BellSouth Telecommunications, Inc., (BellSouth). Intermedia also resells BellSouth's services.

- 4. In this proceeding, the Commission will determine the propriety of BellSouth's "3 Free" promotional tariff, a 90-day promotion designed to win back customers who left BellSouth for an ALEC, presumably including those customers who left BellSouth for

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Intermedia.


5. This docket was opened to address Arrow Communications, Inc.'s (Arrow's) Petition to Review and to Cancel Promotional Tariff, i.e., BellSouth's "3 Free" tariff, filed January 13, 1999.

6. As an ALEC competing for customers with BellSouth in Florida, Intermedia's substantial interests will be affected by the Commission's disposition of Arrow's Petition, in that Intermedia's ability to retain customers won away from BellSouth may be unfairly harmed.

7. Thus, pursuant to Rule 28-106.205, Florida Administrative Code, Intermedia has standing to intervene in this proceeding.

WHEREFORE and in consideration of the above, and in compliance with Rule 28-106.201, Florida Administrative Code, Intermedia Communications Inc., respectfully requests that the Commission grant its Petition to Intervene in Docket No. 990043-TP.

Respectfully submitted,

  
Charles J. Pellegrini  
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Attorneys for Intermedia  
Communications Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail this 29th day of January, 1999, to the following:

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