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May 10, 1999

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BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RECEIVED-FPSC
JUN 15 PM 4:23
RECORDS AND REPORTING

Re: Docket No. 990649-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ACI Corp. in the above docket are the original and fifteen copies of ACI's Petition to Intervene.

By copy of this letter, this document has been furnished to the parties on the attached service list.

Very truly yours,

Gabriel E. Nieto

GEN/mee

cc: Attached Service List

AFA _____
APP _____
CAE _____
CMI *Edward*
CTR _____
EAG _____
LEG *I*
MAS _____
OPC _____
RRR _____
SEC *I*
WAW _____
OTH *Byrd*

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~07278~~ JUN 15 99

RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation Into) Docket No. 990649-TP
Pricing of Unbundled Network)
Elements)
)
) Filed: June 15, 1999
)
_____)

ACI CORP.'s PETITION TO INTERVENE

ACI Corp. (ACI), pursuant to Rule 25-22.039, F.A.C., hereby petitions the Florida Public Service Commission (Commission) to allow it to intervene in this proceeding. In support thereof, ACI states:

1. ACI's address and telephone number are:

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
(303) 476-4200

2. All notices, pleadings and orders should be directed to the following ACI representatives:

Richard D. Melson	Jerry Blumenfeld
Gabriel E. Nieto	Elise Kiley
Hopping Green Sams & Smith, P.A.	Blumenfeld & Cohen
Post Office Box 6526	1615 M Street, NW, Ste.700
Tallahassee, FL 32314	Washington, D.C. 20036

3. ACI is certified by the Commission as an interexchange carrier and as an alternative local exchange telecommunications company. ACI intends to provide high-speed data communications, including high-speed local access, through the deployment of digital subscriber line (DSL) services to business and residential customers throughout the State of Florida.

DOCUMENT NUMBER-DATE
07278 JUN 15 99
FPSC-RECORDS/REPORTING

4. On or about December 10, 1998, the Florida Competitive Carriers Association (FCCA) and several other petitioners filed a Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. That petition requested the Commission to establish a generic unbundled network element (UNE) pricing docket, establish a forum to address operational issues, establish third party testing of BellSouth's operation support systems, promulgate rules for expedited dispute resolution and take other actions to further local exchange competition in BellSouth's service territory. By order dated March 4, 1999, ACI was allowed to intervene as a party in the generic docket established pursuant to the FCCA petition (Docket No. 981834-TP).

5. By Order dated May 26, 1999, the Commission granted the FCCA's request for establishment of a UNE pricing docket and thereby established this Investigation into Pricing of Unbundled Network Elements. ACI now seeks to continue in this proceeding by intervening as a party in this UNE pricing docket.

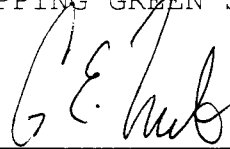
6. As a future provider of facilities-based high-speed data communications services throughout Florida, ACI's substantial interests will be affected by the Commission's actions in this proceeding. Because ACI will purchase UNEs from BellSouth and the other incumbent local exchange carriers, any actions affecting the pricing of those UNEs will impact ACI's substantial interests.

WHEREFORE, ACI respectfully requests that it be given leave to
intervene as a party to this proceeding.

RESPECTFULLY SUBMITTED this 15th day of June, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

By: _____


Richard D. Melson
Gabriel E. Nieto
P.O. Box 6526
Tallahassee, FL 32314
(850) 222-7500

and

BLUMENFELD & COHEN
Jerry Blumenfeld
Elise Kiley
1615 M Street, NW, Suite 700
Washington, D.C. 20036

ATTORNEYS FOR ACI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of ACI's Petition to Intervene was served via U.S. Mail this 15th day of June, 1999 to the following:

Monica Barone
Sprint
3100 Cumberland Circle, #802
Atlanta, Georgia 30339

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GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

William Cox
Division of Legal Services
Florida Public Service
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Tallahassee, Florida 32301

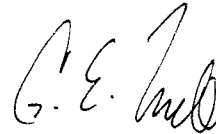
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c/o Nancy H. Sims
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Charles J. Pelligrini
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2145 Delta Boulevard, Suite 200
Tallahassee, Florida 32303



Attorney

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