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June 18, 1999

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Florida Public Service Commission  
Division of Records and Reporting  
Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Re: Docket No. <sup>990649-TP</sup>~~981834-TP~~

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and eight copies of The Competitive Carrier Association's Petition to Intervene in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Sincerely,

*Joe McGlothlin*  
Joseph A. McGlothlin

JAM/sjm

- APA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CVL* Simmons
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 3
- MAS \_\_\_\_\_
- CPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC 1
- WAW \_\_\_\_\_
- OTH Eng. Story

Enclosures

RECEIVED & FILED  
*[Signature]*  
TPSC BUREAU OF RECORDS

*Done 6/23/99*  
McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

DOCUMENT NUMBER-DATE  
**67437 JUN 18 99**  
TPSC-RECORDS/REPORTING

## BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Investigation into pricing of )  
 Unbundled network elements )  
 \_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 18, 1999

THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S  
 PETITION TO INTERVENE

The Florida Competitive Carriers Association (FCCA), through its undersigned counsel, files this Petition to Intervene in this docket. As grounds therefor, FCCA states:

1. The name and address of Petitioner:

The Florida Competitive Carriers Association  
 Post Office Box 10967  
 Tallahassee, Florida 32302

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

Joseph A. McGlothlin  
 Vicki Gordon Kaufman  
 McWhirter, Reeves, McGlothlin, Davidson, Decker,  
 Kaufman, Arnold & Steen, P.A.  
 117 South Gadsden Street  
 Tallahassee, Florida 32301

3. The FCCA is an association of telecommunications providers whose primary purpose is to promote and foster competition in Florida in all markets, including the local exchange market. FCCA has intervened and participated in Commission proceedings affecting its members for more than a decade. FCCA was one of the signatories to the Petition of Competitive Carriers in Docket No. 981834-TL that led to the decision to open this investigatory proceeding on UNE pricing.

DOCUMENT NUMBER-DATE


07437 JUN 18 99

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4. This generic docket was opened to investigate the pricing of network elements that ILECs must provide on an unbundled basis. Many members of FCCA hold ALEC certificates and have executed interconnection and/or resale agreements with incumbent local exchange companies (ILECs) in Florida. As FCCA members contract with ILECs to use UNEs, the Commission's decisions on UNE pricing in this docket will affect their costs of securing UNEs and of providing local exchange service in Florida.

5. A significant number of FCCA members' substantial interests will be affected by the Commission's decisions regarding UNEs. Participation in proceedings on the availability and/or cost of UNEs is within the general scope of FCCA's purpose, interests and activities. The FCCA's intervention in this docket on behalf of its members is therefore appropriate.

WHEREFORE, FCCA requests that the Commission grant its petition to intervene and that it be accorded full party status in this case.

  
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
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Attorneys for The Florida Competitive  
Carriers Association

CERTIFICATE OF SERVICES

I hereby certify that a true and correct copy of the Florida Competitive Carriers Association's foregoing Petition to Intervene has been furnished by Hand Delivery(\*) or United States Mail this 18th of June, 1999, to the following:

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Joseph A. McGlothlin