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Florida Cable Telecommunications Association

RECORDS AND REPORTING

Steve Wilkerson, President

VIA HAND DELIVERY

June 21, 1999

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and 15 copies of the Petition of Florida Cable Telecommunications Association for Leave to Intervene in the above-referenced docket.

Copies of the Petition to Intervene have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

AFA _____
APP _____
CAF _____
C&M _____
CTR _____
EAG _____
LEG _____
MAS _____
CPC _____
RRR _____
SEC _____
WAW _____
OTH _____

Michael A. Gross
Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

MAG/mj

Enclosure

cc: All Parties of Record
Steven E. Wilkerson

Done 6/24/99

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PPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of)
unbundled network elements.)
_____)

Docket No. 990649-TP
Filed: June 21, 1999

PETITION OF FLORIDA CABLE TELECOMMUNICATIONS
ASSOCIATION FOR LEAVE TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in this docket, and states:

1. FCTA is a non-profit trade association representing the cable telecommunications industry in Florida¹. The FCTA's business address is 310 N. Monroe Street, Tallahassee, FL 32301.

2. The name and address of the person authorized to receive all notices, pleadings and other communications in this docket is:

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Association
310 N. Monroe Street
Tallahassee, FL 32301
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3. On December 10, 1998, the Florida Competitive Carriers Association (FCCA) and several other petitioners filed a Petition of Competitive Carriers for Commission Action to

¹ Certificated telecommunications companies represented by FCTA in this proceeding include: Adelphia Telecommunications of Florida, Inc., Comcast MH Telephony Communications of Florida, Inc., Comcast Telephony Communications of Florida, Inc., Cox Florida Telecom, L.P. d/b/a Cox Communications, and Charter Communications d/b/a Cablevision Communications.

to Support Local Competition in BellSouth's Service Territory in Docket No. 981834 -TP. That petition requested the Commission to establish a generic unbundled network element (UNE) pricing docket, a forum to address operational issues, third party testing of BellSouth's operational 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 May 26, 1999, the Commission granted the FCCA's request for establishment of a UNE pricing docket and thereby opened the above styled docket to investigate pricing of unbundled network elements. FCTA is simultaneously filing a petition to intervene in Docket No. 981834-TP, since numerous issues, including OSS, third party testing of OSS systems, costing and pricing of OSS, and collocation and access to loops, remain to be addressed in that docket. It is also necessary for FCTA to intervene in this docket.

4. The Commission's decisions in this docket directly and materially affect FCTA since a substantial number of its members own or have affiliates who are certificated telecommunications companies, including those named above. In particular, FCTA's members purchase unbundled network elements from incumbent local exchange companies, and their substantial interests will be affected by the outcome of this docket. As the representative of the interests of its members' certificated telecommunications companies, the FCTA's intervention is appropriate.

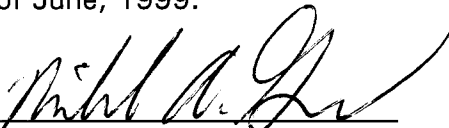
5. The FCTA has actively sought to promote telecommunications competition as a party of record in PSC proceedings for many years. For example, FCTA was granted intervention in the following dockets which directly impacted its members: Docket No. 910757-TP, In Re: Investigation into the Regulatory Safeguards Required to Prevent Cross-Subsidization by Telephone Companies, 91 FPSC 7:467; Docket No. 950696-TP,

FPSC 7:342; see also, Docket No. 950737-TP, Investigation Into Temporary Local Telephone Number Portability Solution to Implement Competition in Local Exchange Telephone Markets, 95 FPSC 7:318; Docket No. 960100-TP, In Re: Generic Investigation Into Permanent Number Portability, 96 FPSC 4:433; and Docket No. 980696-TP, In re: Determination of the Cost of Providing Basic Local Telecommunications Service, Pursuant to Section 364.025, Florida Statutes , 99 FPSC 2:1.

6. FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple certificated telecommunications companies it represents.

WHEREFORE, for the foregoing reasons, FCTA requests that the Commission grant its Petition for Intervention, and afford FCTA full party status in this proceeding.

Respectfully submitted this 21st day of June, 1999.



Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Association
310 N. Monroe Street
Tallahassee, FL 32301
Tel: 850/681-1990
Fax: 850/681-9676

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition of Florida Cable Telecommunications Association for Leave to Intervene in Docket 990649-TX has been served upon the following parties by U.S. Mail this *21st* day of June, 1999:

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