



ORIGINAL

September 16, 1999

**VIA FEDERAL EXPRESS**

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

**RE: Docket No. 981834-TP and 990321-TL**

Dear Ms. Bayo,

Please find an original and fifteen (15) copies of the Petition to Intervene of Covad Communications Company in the above referenced docket. Copies have been served on all parties of record.

In addition, please find an additional copy to be file stamped and sent back to Covad in the enclosed self-addressed stamped envelope.

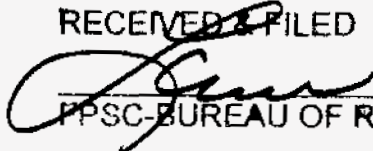
If you should have any questions, please do not hesitate to contact me.

Very truly yours,

  
Cindy N. Alaga  
Covad Communications Company

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAE \_\_\_\_\_
- ~~CMU~~ *enclosures*
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- MAS 3
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- SEC 1
- SAW \_\_\_\_\_
- SH *Handwritten mark*

RECEIVED FILED

  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

*Done 9/20/99*

Covad Communications • 2330 Central Expressway • Santa Clara, CA 95050  
Phone 408 844-7500 • Fax 408 844-7501 • [www.covad.com](http://www.covad.com)

11155 SEP 17 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic Investigation Into  
Collocation Issues

§ Docket Nos. 981834-TP and 990321-TL  
§ (Consolidated)  
§  
§  
§ Filed: September 16, 1999

**PETITION TO INTERVENE OF COVAD COMMUNICATIONS COMPANY**

Pursuant to Rule 25-22.039 of the Rules of the Florida Public Service

Commission, Covad Communications Company ("Covad") files this Petition to Intervene in this docket and would respectfully show the following:

- 1. The name and address of petitioner is

Covad Communications Company  
2330 Central Expressway  
Santa Clara, California 95050  
Tel: (408) 844-7500  
Fax: (408) 844-7501.

- 2. Copies of notices, pleadings and documents in this proceeding should be served upon

Christopher V. Goodpastor, Esq.  
Covad Communications Company  
9600 Great Hills Trail  
Suite 150 W  
Austin, Texas 78759  
Tel.: (512) 502-1713  
Fax: (419) 818-5568  
Email: cgoodpas@covad.com.

- 3. Covad is a certificated alternative local exchange carrier and provides service in the State of Florida. Decisions regarding collocation will affect the interests of Covad. Accordingly, the Commission should grant Covad's Petition to Intervene.


DOCUMENT NUMBER-DATE

11155 SEP 17 99

FPSC-RECORDS/REPORTING

Dated: September 16, 1999

Respectfully submitted,

  
Christopher V. Goodpastor, Esq. *by CA*

Senior Counsel

Covad Communications Company

9600 Great Hills Trail

Suite 150 W

Austin, Texas 78759

Tel.: (512) 502-1713

Fax: (419) 818-5568

Email: cgoodpas@covad.com

REPRESENTATIVE OF COVAD  
COMMUNICATIONS COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on the enclosed service list via US Mail on September 16, 1999.

  
\_\_\_\_\_

**ACI CORPORATION  
7337 S. REVERE PARKWAY  
ENGELWOOD, CO 80112**

**AT&T COMMUNICATIONS OF THE  
SOUTHERN STATES, INC.  
MS. RHONDA P. MERRITT  
101 NORTH MONROE STREET, SUITE 700  
TALLAHASSEE, FL 32301-1549**

**BELLSOUTH COMMUNICATIONS, INC.  
MS. NANCY H. SIMS  
150 SOUTH MONROE STREET, SUITE 400  
TALLAHASSEE, FL 32301-1556**

**BLUMENFELD & COHEN  
ELISE KIELY/JEFFREY BLUMENFELD  
1625 MASSACHUSETTS AVE., NW, SUITE 300  
WASHINGTON, D.C. 20036**

**COMPTEL  
TERRY MONROE  
1900 M STREET, NW, SUITE 800  
WASHINGTON, D.C. 20036**

**e.spire COMMUNICATIONS, INC.  
JAMES FALVEY  
133 NATIONAL BUSINESS PARKWAY, SUITE  
200  
ANNAPOLIS JUNCTION, MD 20701**

**FLORIDA CABLE TELECOMMUNICATIONS  
ASSOC., INC.  
MICHAEL A. GROSS  
310 N. MONROE ST.  
TALLAHASSEE, FL 32301**

**FLORIDA COMPETITIVE CARRIERS  
ASSOCIATION  
c/o McWIRTHER LAW FIRM  
VICKI KAUFMAN  
117 S. GADSDEN ST.  
TALLAHASSEE, FL 32301**

**FLORIDA PUBLIC TELECOMMUNICATIONS  
ASSOCIATION  
ANGELA GREEN, GENERAL COUNSEL  
125 S. GADSDEN ST., #200  
TALLAHASSEE, FL 32301-1525**

**GTE FLORIDA INCORPORATED  
KIMBERLY CASWELL  
P O BOX 110, FLTCOOO7  
TAMPA, FL 33601-0110**

**GTE FLORIDA INCORPORATED  
MS. BEVERLY Y. MENARD  
% MS. MARGO B. HAMMAR  
106 EAST COLLEGE AVENUE, SUITE 810  
TALLAHASSEE, FL 32301-7704**

**HOPPING LAW FIRM  
RICHARD MELSON/GABRIEL NIETO  
P O BOX 6526  
TALLAHASSEE, FL 32314**

**INTERMEDIA COMMUNICATIONS, INC.  
SCOTT SAPPERSTEINN  
3625 QUEEN PALM DRIVE  
TAMPA, FL 33619-1309**

**LOCKHEED MARTIN IMS  
ANITA L. FOURCARD  
COMMUNICATIONS INDUSTRY SERVICES  
1200 K STREET, N.W.  
WASHINGTON, D.C. 20005**

**MCImetro ACCESS TRANSMISSION SERVICES  
LLC  
MS. DONNA CANZANO McNULTY  
325 JOHN KNOX ROAD, SUITE 105  
TALLAHASSEE, FL 32303**

**McWIRTHER LAW FIRM  
JOSEPH McGLOTHLIN/VICKI KAUFMAN  
117 S. GADSDEN STREET  
TALLAHASSEE, FL 32301**

**MEDIAONE FLORIDA  
TELECOMMUNICATIONS, INC.  
c/o LAURA L. GALLAGHER  
LAURA L. GALLAGHER, P.A.  
204 S. MONROE STREET, SUITE 201  
TALLHASSEE, FL 32301**

**MESSER LAW FIRM  
FLOYD SELF/NORMAN HORTON  
P O BOX 1876  
TALLAHASSEE, FL 32302**

**MGC COMMUNICATIONS, INC.  
SUSAN HUTHER  
3301 NORTH BUFFALO DRIVE  
LAS VEGAS, NV 89129**

**PENNINGTON LAW FIRM  
PETER DUNBAR/BARBARA AUGER/MARC  
DUNBAR  
P O BOX 10095  
TALLAHASSEE, FL 32301**

**SPRINT-FLORIDA, INCORPORATED**  
**F.B. (BEN) POAG**  
**P O BOX 2214 (MC FLTLHO0107)**  
**TALLAHASSEE, FL 32316-2214**

**SUPRA TELECOMMUNICATIONS &**  
**INFORMATION SYSTEMS, INC.**  
**DAVID DIMLICH, ESQ.**  
**2620 S.W. 27<sup>TH</sup> AVENUE**  
**MIAMI, FL 33133-3001**

**TCG SOUTH FLORIDA**  
**% RUTLEDGE LAW FIRM**  
**KENNETH HOFFMAN**  
**P O BOX 551**  
**TALLAHASSEE, FL 32302-0551**

**TELECOMMUNICATIONS RESELLERS**  
**ASSOCIATION**  
**ANDREW ISAR**  
**3220 UDDENBERG LANE, SUITE 4**  
**GIG HARBOR, WA 98335**

**TIME WARNER TELECOM**  
**2301 LUCIEN WAY, SUITE 300**  
**MAITLAND, FL 32751**

**TIME WARNER TELECOM**  
**MS. CAROLYN MAREK**  
**233 BRAMERTON COURT**  
**FRANKLIN, TN 37069**

**WIGGINS LAW FIRM**  
**CHARLIE PELLEGRINI/PATRICK WIGGINS**  
**P O DRAWER 1657**  
**TALLAHASSEE, FL 32302**

**WORLDCOM TECHNOLOGIES, INC.**  
**DONNA McNULTY, ESQ.**  
**325 JOHN KNOX ROAD, SUITE 105**  
**TALLAHASSEE, FL 32303**