

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: GENERIC INVESTIGATION INTO APPROPRIATE METHODS TO COMPENSATE CARRIERS FOR EXCHANGE OF TRAFFIC SUBJECT TO SECTION 251 OF THE TELECOMMUNICATIONS ACT OF 1996.

Docket Number: 000075-TP Filed: May 5, 2000

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GLOBAL NAPs, INC.'S PETITION FOR LEAVE TO INTERVENE

GLOBAL NAPs, INC. (hereinafter "GNAPS") files this Petition for Leave to Intervene in the above-referenced proceeding, pursuant to Rule 25-22.039, Florida Administrative Code. In support of this Petition, GNAPS states the following:

I. NAME AND ADDRESS OF AGENCY AND PETITIONER

- 1. The name and address of the affected agency is:

Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

- 2. The name and address of the Petitioner is:

GLOBAL NAPs, INC. 10 Merrymount Road Quincy, Massachusetts 02169

- 3. All pleadings, orders, and other documents directed to the Petitioner are to be served on:

Jon C. Moyle, Jr., Esq. Cathy M. Sellers, Esq. Moyle, Flanigan, Katz, Kolins, Raymond & Sheehan, P.A. The Perkins House 118 N. Gadsden Street Tallahassee, Florida 32301 (850) 681-3828 (850) 681-8788 (Facsimile) (jmoylejr@moylslaw.com; csellers@moylslaw.com)

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II. EXPLANATION OF HOW SUBSTANTIAL INTERESTS OF PETITIONER WILL BE AFFECTED BY COMMISSION DETERMINATION

4. GNAPS is an alternative local exchange telecommunications company ("ALEC") under Florida law. GNAPS provides its customers with intrastate telecommunications services within the State of Florida. GNAPS has entered into interconnection agreements under Section 251 of the Telecommunications Act of 1996 with incumbent local exchange telecommunications companies ("ILECs") regarding telecommunications services provided by the parties within the state of Florida. Key provisions of the interconnection agreements address exchange of local traffic, whether compensation is due for such exchange, and how such exchange is compensated.

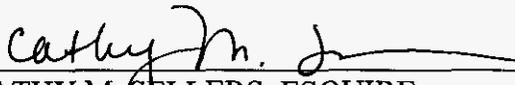
5. To illustrate, GNAPS has an interconnection agreement arbitration proceeding currently pending before the Commission, a key issue in which is compensation for exchange of traffic under the interconnection agreement. See Docket No. 991220-TP. Also, the Commission recently issued an Order resolving GNAPS' complaint against an ILEC for compensation for exchange of certain local telecommunications traffic. See Order No. PSC-00-0802-FOF-TP, Docket No. 991267-TP. Furthermore, in the future, GNAPS likely will enter into interconnection agreements that will address compensation for local traffic exchange.

6. In this proceeding, the Commission will address issues regarding compensation for carriers for the exchange of traffic subject to Section 251 of the Telecommunications Act of 1996. As illustrated in the preceding paragraphs and for the reasons discussed therein, GNAPS' substantial interests will be affected and determined by the Commission in this proceeding. Accordingly, GNAPS is entitled to intervene and participate as a party in this proceeding.

WHEREFORE, GNAPS respectfully requests that the Commission grant this Petition to Intervene in this proceeding, and that it and be granted all rights and obligations of a party having intervenor status.

Respectfully submitted this 5th day of May, 2000.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of GLOBAL NAPs, Inc.'s Petition for Leave to Intervene has been furnished by U.S. Mail to the following parties of record this 5th day of May, 2000.


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