



ORIGINAL

October 26, 2000

VIA EXPRESS MAIL

Blanca S. Bayo
Director, Records and Reporting
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 000121-TP - Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies.

Dear Ms. Bayo:

Enclosed please find for filing the original and fifteen (15) copies of the Petition to Intervene of Birch Telecom of the South, Inc. in the above-captioned docket. Also enclosed is an extra copy of this letter. Please date-stamp and return in the enclosed self-addressed, postage prepaid envelope.

Thank you for your assistance with this filing. Should you have any questions regarding this matter, please do not hesitate to contact me at 919-562-3069.

Sincerely yours,

Monica M. Barone / HDB

Monica M. Barone
Director, State Regulation
Birch Telecom of the South, Inc.

- APP _____
- CAF _____
- CMP 3
- COM 3
- CTR _____
- ECR 1
- LEG 1
- OPC _____
- PAI _____
- RGD 1
- SEC _____
- SER _____
- OTH _____

Enclosure (1)
cc: Timothy Vaccaro
Parties of Record

RECEIVED & FILED
[Signature]
FPSC RECORDS

DOCUMENT NUMBER-DATE
13840 OCT 27 8

Done 10/31/00

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment)	Docket No. 000121-TP
of operations support systems permanent)	
performance measures for incumbent local)	
exchange telecommunications companies.)	
_____)	Filed: October 26, 2000

PETITION TO INTERVENE
OF
BIRCH TELECOM OF THE SOUTH, INC.

COMES NOW Birch Telecom of the South, Inc. ("Birch") and, pursuant to Rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission ("Commission") in the above-referenced docket. Birch respectfully requests the Commission to grant this Petition, designating Birch as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, Birch respectfully shows as follows:

1. Petitioner's full name and principal place of business are:

Birch Telecom of the South, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108

2. All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

Monica M. Barone, Esq.
Director, State Regulation
Birch Telecom of the South, Inc.
8001 Fairlake Drive
Wake Forest, N.C. 27587
(919) 562-3069

Tad J. (T.J.) Sauder


DOCUMENT NUMBER-DATE
13840 OCT 27 8
FPSC-RECORDS/REPORTING

Manager, ILEC Performance Data
Birch Telecom of the South, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108
(816) 300-3202

3. Birch is a telecommunications company that has been duly certificated by the Commission as an alternative local exchange telecommunications company ("ALEC") and an interexchange company ("IXC") in Florida. As such, Birch is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact Birch's ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.

4. As an ALEC, Birch must utilize the operations support systems of incumbent local exchange companies in order to provide local exchange service. Accordingly, Birch's substantial interests will be affected by any action that the Commission takes in this docket regarding establishment of permanent performance measures for incumbent local exchange telecommunications companies.

WHEREFORE, Birch requests that it be permitted to intervene in this proceeding and that it be accorded full party status.


Monica M. Barone
Birch Telecom of the South, Inc.

CERTIFICATE OF SERVICE
DOCKET 000121-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via U.S. Mail or express mail * to the following parties of record on this the 26th day of October, 2000:

*Timothy Vaccaro
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