



ORIGINAL

RECEIVED - FPSC

00 DEC 22 PM 12:52

Florida Cable Telecommunications Association

RECORDS AND REPORTING

Steve Wilkerson, President

**VIA HAND DELIVERY**

December 22, 2000

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. 001503-TP**

Dear Ms. Bayo:

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

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,

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

Enclosure

cc: All Parties of Record

APP  
CAF  
CIVIL Casey  
COM 5  
CTR  
ECR  
LEG  
OPC  
PAL  
RDO  
SEC  
SER  
OTH

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

16355 DEC 22 00

FPSC-RECORDS/REPORTING

FN 12/22/00

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Cost Recovery and Allocation Issues )  
for Number Pooling Trials in Florida )  
 )  
 )  
\_\_\_\_\_ )

Docket No. 001503-TP

Filed: December 22, 2000

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. The FCTA is a non-profit trade association representing the cable telecommunications industry in Florida, including certificated alternative local exchange carriers (ALECs) providing local exchange telecommunications service in Florida. The FCTA's business address is 246 E. 6<sup>th</sup> Avenue, Suite 100, Tallahassee, FL 32303.

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  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676  
E-mail: mgross@fcta.com

3. The issues raised in this docket concern cost recovery and cost allocation issues for number pooling trials in Florida affecting telecommunications carriers, including ALECs represented

by the FCTA. Accordingly, the FCTA's substantial interests will be affected by the outcome of this proceeding regarding cost recovery and allocation issues for number pooling trials in Florida.

4. As the representative of the interests of its members' certificated telecommunications carriers, the FCTA's intervention is appropriate. The FCTA has actively sought to promote telecommunications competition as a party of record in Commission proceedings for many years and has been granted intervention in numerous dockets which directly impacted its members.

5. The FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple certificated telecommunications carriers it represents.

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

Respectfully submitted this 22 day of December, 2000.



Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
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 001503-TP has been served upon the following parties by U.S. Mail this 22 day of December, 2000:

BellSouth Telecommunications, Inc.  
Ms. Nancy B. White  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Kimberly Caswell, Esquire  
Verizon Florida Incorporated  
P.O. Box 110, FLTC0007  
Tampa, FL 33601

BellSouth Telecommunications, Inc.  
Mr. Michael P. Goggin  
150 West Flagler Street, Suite 1910  
Miami, FL 33130

Pennington Law Firm  
Peter Dunbar/Karen Camechis  
P.O. Box 10095  
Tallahassee, FL 32302-2095

BellSouth Telecommunications, Inc.  
R. Douglas Lackey  
675 W. Peachtree St., NE, #4300  
Atlanta, GA 30375

Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
2333 Bramerton Court  
Franklin, Tennessee 37069

Office of Public Counsel  
Charles Beck  
c/o The Florida Legislature  
111 W. Madison St., #812  
Tallahassee, FL 32399-1400

Sprint-Florida, Inc.  
Susan Masterton  
P.O. Box 2214  
MS: FLTLH00107  
Tallahassee, FL 32316-2214

VoiceStream Wireless  
Rutledge Law Firm  
Kenneth Hoffman/John Ellis  
P.O. Box 551  
Tallahassee, FL 32302-0551

Verizon Wireless  
Anne Hoskins  
180 Washington Valley Road  
Bedminster, NJ 07921

  
Michael A. Gross