

ORIGINAL

**MCWHIRTER REEVES**  
ATTORNEYS AT LAW

TAMPA OFFICE:  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602  
P. O. BOX 3350 TAMPA, FL 33601-3350  
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:  
  
TALLAHASSEE

TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

January 18, 2001

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

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RECORDS AND REPORTING

Re: Docket No.:000121-TP

Dear Ms. Bayo:

On behalf of DIECA Communications Company d/b/a Covad Communications Company, enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Petition to Intervene of Covad Communications Company.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Sincerely,

*Vicki Gordon Kaufman*

Vicki Gordon Kaufman

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DOCUMENT NUMBER - DATE  
00761 JAN 18 01  
FPSC-RECORDS/REPORTING

McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

*Done 1/26/01*

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the Establishment of  
Operations Support Systems Permanent  
Performance Measures for Incumbent Local  
Exchange Telecommunications Companies

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Docket No.: 000121-TP  
Filed: January 18, 2001

**PETITION TO INTERVENE OF  
COVAD COMMUNICATIONS COMPANY**

DIECA Communications Company d/b/a Covad Communications Company (Covad),  
pursuant to Rule 28-106.205, Florida Administrative Code, files this Petition to Intervene and as  
grounds therefor states:

1. The name and address of Petitioner is:

DIECA Communications Company d/b/a Covad Communications Company  
2330 Central Expressway  
Santa Clara, CA

2. Copies of all pleadings, notices, and orders in this Docket should be provided to:

Catherine F. Boone  
Covad Communications Company  
10 Glenlake Parkway, Suite 650  
Atlanta, Georgia 30328-3495  
(678) 579-8388 (telephone)  
(240) 525-5673 (fax)  
cboone@covad.com

Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525 (telephone)  
(850) 222-5606 (fax)  
vkaufman@mac-law.com

DOCUMENT NUMBER-DATE

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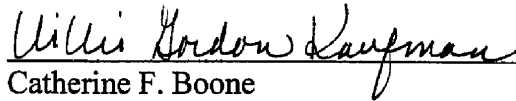
3. **Statement of Substantial Interests.** Covad is a provider of x DSL services. It provides high-speed Internet and network access utilizing digital subscriber line (DSL) technology. Covad offers DSL services through Internet Service Providers (ISPs) to small and medium-sized businesses and home users and directly to companies who use DSL to enable their employees to connect with their businesses' internal computer networks (or Local Area Networks) from their homes. In Florida, Covad provides services to residential consumers and businesses in Miami, Orlando, Tampa and Jacksonville.

4. In providing its service offerings, Covad must purchase unbundled network elements (UNEs) from incumbent local exchange carriers, such as BellSouth, GTE, and Sprint, and must provision those UNEs through use of the incumbent local exchange carriers' operations support systems (OSS). Therefore, performance metrics set by the Commission in this proceeding will directly and substantially affect Covad's ability to provide service to Florida consumers. Therefore, Covad has an important and substantial interest in this proceeding.

5. **Statement of Material Facts in Dispute.** Petitioner is unable to identify disputes of material fact at this time.

6. **Ultimate Facts Alleged.** Comprehensive and effective performance measures are essential to ensure that ALECs receive nondiscriminatory access to OSS systems.

**WHEREFORE**, Covad requests that its Petition to Intervene be granted and that it be accorded full party status in this docket.



Catherine F. Boone  
Covad Communications Company  
10 Glenlake Parkway, Suite 650  
Atlanta, Georgia 30328-3495  
(678) 579-8388 (telephone)  
(240) 525-5673 (fax)

Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525 (telephone)  
(850) 222-5606 (fax)

Attorneys for Covad Communications Company

## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the Petition to Intervene of Covad Communications Company has been furnished by (\*) Hand Delivery or U.S. Mail this 18th day of January, 2001:

(\*)Tim Vaccaro  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Morton Posner  
Allegiance Telecom of Florida, Inc.  
1950 Stemmons Freeway, Suite 3026  
Dallas, TX 75207-3118

Marsha Rule  
AT&T  
101 North Monroe Street, Suite 700  
Tallahassee, Florida 32301-1549

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

James C. Falvey  
e.spire Communications, Inc.  
133 National Business Parkway  
Suite 200  
Annapolis Junction, MD 20701

Michael A. Gross  
Florida Cable Telecommunications, Assoc.  
246 E. 6th Avenue  
Tallahassee, Florida 32303

Mr. Paul Rebey  
Focal Communications Corporation of Florida  
200 North LaSalle Street, Suite 1100  
Chicago, IL 60601-1914

Global NAPS, Inc.  
10 Merrymount Road  
Quincy, MA 02169

Scott Sapperstein  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309

Donna Canzano McNulty  
MCI WorldCom  
325 John Knox Road, Suite 105  
Tallahassee, Florida 32303-4131

Laura L. Gallagher  
MediaOne Florida Telecommunications, Inc.  
101 E. College Avenue, Suite 302  
Tallahassee, Florida 32301

Norman Horton, Jr.  
Messer Law Firm  
215 S. Monroe Street, Suite 701  
Tallahassee, Florida 32301-1876

Jon Moyle and Cathy Sellers  
Moyle Law Firm  
The Perkins House  
118 North Gadsden Street  
Tallahassee, Florida 32301

Herb Bornack  
Orlando Telephone Company  
4558 SW 35th Street, Suite 100  
Orlando, Florida 32811-6541

Peter Dunbar and Karen Camechis  
Pennington Law Firm  
Post Office Box 10095  
Tallahassee, Florida 32302-2095

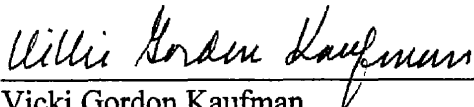
Kenneth Hoffman and John Ellis  
Rutledge Law Firm  
Post Office Box 551  
Tallahassee, Florida 32302-0551

Charles J. Rehwinkel and Susan Masterton  
Sprint-Florida, Incorporated  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, Florida 32316

Mark Buechele  
Supra Telecom  
1311 Executive Center Drive, Suite 200  
Tallahassee, Florida 32301

Kimberly Caswell  
Verizon Select Services, Inc.  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110

Charlie Pellegrini and Patrick Wiggins  
Wiggins Law Firm  
Post Office Drawer 1657  
Tallahassee, Florida 32302

  
\_\_\_\_\_  
Vicki Gordon Kaufman