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February 2, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

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01 FEB -2 PM 2:28
RECORDS AND REPORTING

Re: Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of TCG South Florida and Teleport Communications Group Inc. ("TCG South Florida") are the original and fifteen copies of TCG South Florida's Petition to Intervene.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Martin P. McDonnell

- APP _____
- CAF MPM/rl
- CMP Enclosures
- COM 5 cc: All Parties of Record
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DOCUMENT NUMBER-DATE

01542 FEB-20

FPSC-RECORDS/REPORTING

Done 2/07/01

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate)
methods to compensate carriers for)
exchange of traffic subject to Section 251)
of the Telecommunications Act of 1996.)
_____)

Docket No. 000075-TP

Filed: February 2, 2000

**PETITION OF TCG SOUTH FLORIDA AND
TELEPORT COMMUNICATIONS GROUP INC.
TO INTERVENE**

TCG South Florida and Teleport Communications Group Inc. (hereinafter collectively referred to as "TCG South Florida"), by and through its undersigned counsel, and pursuant to Rule 25-22.039, Florida Administrative Code, respectfully petitions the Florida Public Service Commission ("Commission") to grant this Petition to Intervene and permit TCG South Florida to participate in this proceeding as a party of record, affording it all applicable rights under Florida law and the rules of the Commission. In support of this Petition to Intervene, TCG South Florida states as follows:

1. Petitioner TCG South Florida and Teleport Communications Group Inc.'s full name and its business address are as follows:

TCG South Florida
Teleport Communications Group Inc.
1 East Broward Boulevard
Suite 910
Fort Lauderdale, FL 33301
(954) 453-4200 (Telephone)
(954) 453-4444 (Telecopier)

2. All pleadings, notices, staff memoranda, orders and other documents and communications filed or served in this proceeding should be served on the following on behalf of TCG South Florida:

DOCUMENT NUMBER-DATE

01542 FEB-20

FPSC-RECORDS/REPORTING

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3. TCG South Florida is authorized by the Commission to provide local exchange service in Florida as an alternative local exchange telecommunications company (“ALEC”) pursuant to AAV Certificate No. 3519. As such, TCG South Florida is subject to the statutes, rules and orders of the Commission and such statutes, rules and orders impact both TCG South Florida's ability to provide telecommunications services in Florida and TCG South Florida's ability to compete in Florida.

4. This proceeding will focus on a host of legal, factual and policy issues concerning the delivery of Internet Service Provider-bound traffic, including whether the delivery of such traffic is subject to compensation under Section 251 of the Telecommunications Act of 1996 and the appropriate intercarrier compensation mechanism for the delivery of such traffic. As an ALEC, TCG South Florida exchanges traffic with incumbent local exchange companies and other ALECs in order to provide local exchange service. Thus, the Commission's decisions in this proceeding, which are anticipated to have general applicability, affect TCG South Florida's substantial interests, entitling TCG South Florida to participate with party status as a matter of law.

WHEREFORE, for the foregoing reasons, TCG South Florida respectfully requests that it be granted intervention as a full party in this proceeding.

Respectfully submitted,



Kenneth A. Hoffman, Esq.

Martin P. McDonnell, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Petition of TCG South Florida to Intervene was furnished by U. S. Mail to the following this 2nd day of February, 2001:

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By: 
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AT&T/intervene.tcg