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February 12, 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

Re:

Docket No. 000075-TP

Docket No. 0000/3-1P

HAND DELIVERY

RECORDS AND

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of MediaOne Florida Telecommunications, Inc., d/b/a AT&T Broadband Florida Telecommunications, Inc. and d/b/a AT&T Digital Phone ("MediaOne") are the original and fifteen copies of MediaOne'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
CMP
COM 5 MPM/rl
CTR Enclosures
ECR
LEG cc: All Parties of Record
OPC
PAI
RGO
SEC
SER
FPSCRIPEAN CO

DOCUMENT NUMBER-DATE

02006 FEB 125

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate	)	
methods to compensate carriers for	)	Docket No. 000075-TP
exchange of traffic subject to Section 251	)	
of the Telecommunications Act of 1996.	_)	Filed: February 12, 2000
	)	

## PETITION OF MEDIAONE FLORIDA TELECOMMUNICATIONS, INC. D/B/A AT&T BROADBAND FLORIDA TELECOMMUNICATIONS, AND D/B/A AT&T DIGITAL PHONE TO INTERVENE

MediaOne Florida Telecommunications, Inc. d/b/a AT&T Broadband Florida Telecommunications and d/b/a AT&T Digital Phone (hereinafter referred to as "MediaOne"), 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 MediaOne 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, MediaOne states as follows:

1. Petitioner MediaOne's full name and its business address are as follows:

MediaOne Florida Telecommunications, Inc. d/b/a AT&T Broadband Florida Telecommunications and d/b/a AT&T Digital Phone c/o Rhonda P. Merritt 101 N. Monroe Street., Ste. 700 Tallahassee, FL 32301

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 MediaOne:

DOCUMENT NUMBER-DATE
02006 FEB 12 =

FPSC-PECORDS/HEPDRING

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- 3. MediaOne is authorized by the Commission to provide local exchange service in Florida as an alternative local exchange telecommunications company ("ALEC") pursuant to Certificate No. 4404. As such, MediaOne is subject to the statutes, rules and orders of the Commission and such statutes, rules and orders impact both MediaOne's ability to provide telecommunications services in Florida and MediaOne'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, MediaOne 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 MediaOne substantial interests, entitling MediaOne to participate with party status as a matter of law.

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

Respectfully submitted,

Marti M. M. Co.

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Petition of MediaOne to Intervene was furnished by U. S. Mail to the following this 12 day of February, 2001:

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AT&T/intervene.MediaOne