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March 1, 2001

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
4075 Esplanade Way, Room 110  
Tallahassee, Florida 32399-0850

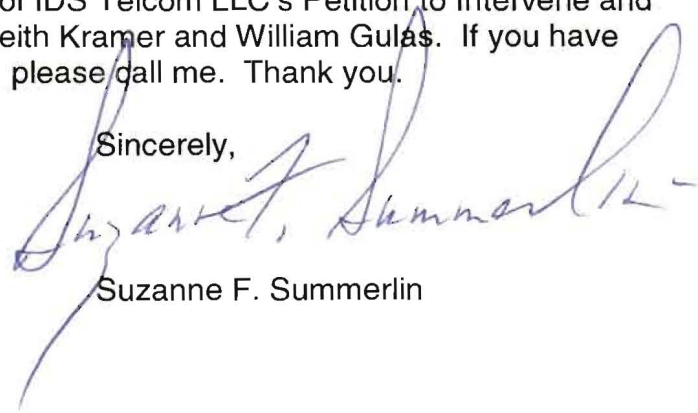
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RECORDS AND REPORTING

RE: Docket No. 000121-TP, In re: Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies.

Dear Ms. Bayo:

Enclosed for filing on behalf of IDS Telcom LLC in Docket No. 000121-TP are the original and fifteen copies of IDS Telcom LLC's Petition to Intervene and IDS Telcom LLC's Testimony of Keith Kramer and William Gulas. If you have any questions regarding this filing, please call me. Thank you.

Sincerely,



Suzanne F. Summerlin

SFS/bb  
Enclosures (32)  
48

APP \_\_\_\_\_  
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DOCUMENT NO  
02799-01

**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: March 1, 2001

**PETITION TO INTERVENE OF  
IDS TELCOM L.L.C.**

IDS Telcom L.L.C. ("IDS"), 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:

IDS Telcom L.L.C.  
1525 Northwest 167th Street, Second Floor  
Miami, Florida 33169

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

Suzanne F. Summerlin, Esq.  
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3. **Statement of Substantial Interests.** IDS is a certified ALEC in the  
State of Florida. IDS is authorized by the Florida Public Service Commission to  
provide local telecommunications services in the State of Florida. Because this  
proceeding will be addressing issues regarding service quality measurements,  
enforcement measures, benchmarks and analogs and an enforcement plan, the

DOCUMENT NUMBER-DATE

02799 MAR-16

FPSC-RECORDS/REPORTING

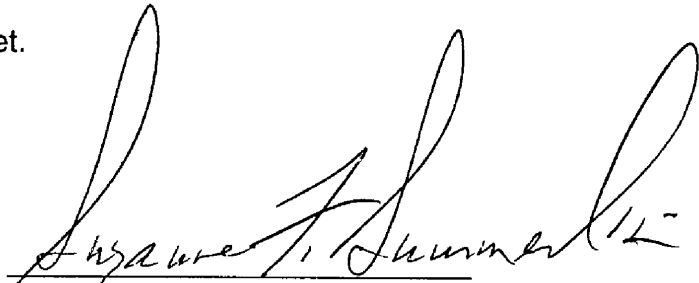
Commission's decisions in this docket will directly and substantially affect IDS's interests.

4. Performance metrics set by the Commission in this proceeding are of utmost importance to IDS's ability to provide service to Florida consumers.

5. **Statement of Material Facts in Dispute.** Petitioner is unable to identify specific disputes of material facts 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,** IDS requests that its Petition to Intervene be granted and that it be accorded full party status in this docket.



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Attorney for IDS Telcom L.L.C.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Petition to Intervene of IDS Telcom L.L.C. has been furnished by hand delivery(\*) or U.S. mail on this 1st day of March 2001, to:

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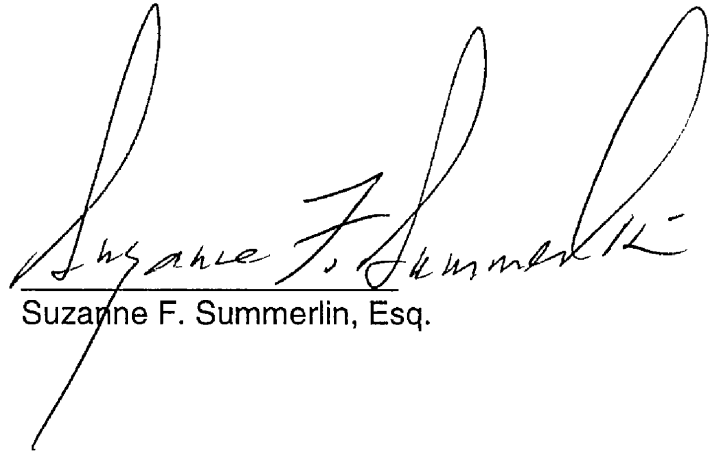
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