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April 10, 2001

VIA HAND DELIVERY

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Re: Docket No.: 010345-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association, (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ The Florida Competitive Carriers Association's Petition to Intervene, and 04406-01
- ▶ The Florida Competitive Carriers Association's Request for Commission Investigation Concerning the Use of Structural Incentives to Open Local Telecommunications Markets in Support of AT&T's Petition to Initiate Proceedings. 04407-01

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

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Sincerely,



Joseph A. McGlothlin

Done

4/10/01

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of AT&T Communications of the Southern States, Inc., TCG South Florida, and MediaOne Florida Telecommunications, Inc. for Structural Separation of BellSouth Telecommunications, Inc. into two distinct wholesale and retail corporate subsidiaries

Docket No. 010345-TP

Filed: April 10, 2001

**The Florida Competitive Carriers Association's
Petition to Intervene**

Pursuant to Rule 28-106.205, Florida Administrative Code, the Florida Competitive Carriers Association (FCCA), through its undersigned counsel, submits its Petition to Intervene, and in support thereof states:

1. The name and address of the Petitioner is:

Florida Competitive Carriers Association
117 S. Gadsden Street
Tallahassee, Florida 32312

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

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

Brian D. Sulmonetti
MCI Telecommunications Corporation
Concourse Corporate Center Six
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

DOCUMENT NUMBER-DATE
04406 APR 10 2001
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3. Statement of Substantial Interests. The FCCA is an industry organization composed of carriers and associations of carriers who advocate the formulation and adoption of policies that would foster the development of competition in all telecommunications markets. The FCCA was formed for the purpose of articulating its members' positions on matters affecting the framework for competition in proceedings before the Florida Public Service Commission. In this proceeding, the Commission will consider whether, in the interest of the development of a competitive local exchange market, it should require BellSouth Telecommunications, Inc. ("BellSouth") to form separate wholesale and retail entities. The subject of the docket bears directly on the development of a regulatory and business environment conducive to the development and eventual flourishing of competition in Florida's local exchange market. The decision of the Commission in this docket will affect the competitive posture of FCCA's members. Intervening for the purpose of communicating its members' positions and views on the subject of the docket is consistent with the purpose of FCCA and appropriate for an organization such as FCCA to undertake.

4. Statement of Disputed Issues of Material Fact: While the disputed issues of material fact cannot be identified with certainty at this point, FCCA anticipates that BellSouth may dispute that a need exists to impose structural separation on BellSouth. FCCA reserves the right to address these and other issues as its interests may require.

5. Ultimate Facts Alleged: BellSouth's disincentives to serve its competitors timely and efficiently has rendered competition in the local exchange market non-viable in Florida. Structural separation is needed to remove such disincentives. FCCA's position is set forth in more detail in FCCA's Request for Commission Investigation Concerning the Use of Structural Incentives to Open Local Telecommunications Markets in Support of AT&T's Petition to Initiate Proceeding, which is

being filed this date.

WHEREFORE, the Florida Competitive Carriers Association requests the Commission to enter an Order authorizing it to intervene with full party status.



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Attorneys for Florida Competitive Carriers
Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of FCCA's Petition to Intervene has been furnished by U.S. mail or by hand-delivery (*) this 10th day of April, 2001 to the following:

(*) Beth Keating
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Marsha Rule
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301

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

Peter Dunbar/Karen Camechis
Time Warner
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302



Joseph A. McGlothlin