

April 10, 2001

VIA OVERNIGHT MAIL

Blanca S. Bayó, Director
Florida Public Service Commission
2540 Shumard Oaks Blvd.
Tallahassee, Florida 32399-0850

**RE: ITC^DeltaCom Communications, Inc. – Petition to Intervene
Docket No. 960786-TL**

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom Petition to Intervene in Docket No. 960786-TL. 04465100

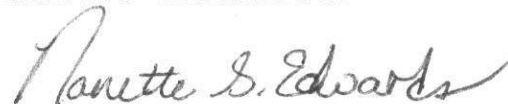
Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same in the enclosed self-addressed stamped envelope.

I have also enclosed the Affidavit of Nanette Edwards, together with the letter from Jerry Watts requesting that Nanette Edwards be named qualified representative of ITC^DeltaCom in the above referenced docket. 04466-01

Should you have any questions, please do not hesitate to contact the undersigned at (256) 382-3856.

Sincerely,

**ITC^DELTACOM COMMUNICATIONS, INC.
d/b/a ITC^DELTACOM**



Nanette S. Edwards
Director of Regulatory Advocacy & Senior Attorney

- APP _____
- CAF _____
- CMP _____
- COM 5
- CTR _____
- ECR _____
- LEG 1
- OPC 1
- PAI _____
- REG _____
- SEC 1
- SER _____
- OTH _____

Enclosure
FLPet_Intervenecoverltr.doc

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04465 APR 11 01

Done 4/12/01

www.itcdeltacom.com ▶ Customer Support 1-800-239-3000
data>internet>phone systems>local>long distance: hey, that's our job

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth Telecommunications, Inc.'s) Docket No. 960786-TL
entry into InterLATA services pursuant to Section 271 of the)
Federal Telecommunications Act of 1996)
_____) Filed: April 10, 2001

PETITION TO INTERVENE
OF
ITC^DELTA COM

COMES NOW, ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom (“ITC^DeltaCom”) and, pursuant to Rule 25-22.039, Florida Administrative Code, respectfully petitions to intervene in the above-referenced proceeding. In support of its Petition, ITC^DeltaCom states as follows:

1. ITC^DeltaCom is a competitive local exchange carrier with its corporate headquarters located at 1791 O.G. Skinner Drive, West Point, Georgia 31833. ITC^DeltaCom has authorization to provide competitive local exchange services in Florida pursuant to its CPCN: Docket No. 980352-TX Order No. PSC-98-0646A-FOF-TX.

2. ITC^DeltaCom, as a competitive local exchange carrier, must utilize the operations support systems of incumbent local exchange carriers in order to provide local service. As such, ITC^DeltaCom’s substantial interests will be affected by the outcome in this proceeding regarding establishment of permanent performance measures for ILECs.

3. No party will be prejudiced by allowing this late intervention whereas ITC^DeltaCom’s rights and interests may be substantially affected by decisions and orders by the Commission pursuant to this proceeding.

DOCUMENT NUMBER-DATE

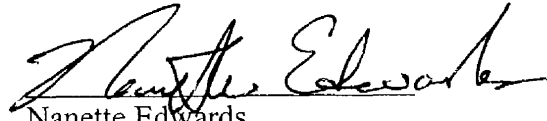
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FPSC-RECORDS/REPORTING

4. No other party can adequately represent ITC^DeltaCom's interests.

WHEREFORE, ITC^DeltaCom respectfully requests that the Commission grant the Petition to Intervene in full allowing ITC^DeltaCom to participate fully as a party of record including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nanette Edwards", is written over a horizontal line.

Nanette Edwards
Director of Regulatory Advocacy & Sr. Atty.
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, Alabama 35802
PH: (256) 382-3856
FAX: (256) 382-3969

FL960786MotIntervene.doc

CERTIFICATE OF SERVICE

This is to certify that I have served copies of the Petition to Intervene of ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom upon the following parties of record by first class mail, this 10th day of April, 2001.

American Communications Services, Inc.
James Falvey
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BellSouth Telecommunications, Inc.
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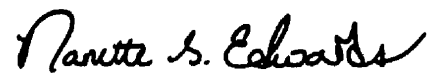
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