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May 8, 2001

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RECORDS AND REPORTING

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 960786-TL

Dear Ms. Bayo:

On behalf of NewSouth Communications, enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ NewSouth Communications Petition to Intervene.

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

Sincerely,

Vicki Gordon Kaufman

Vicki Gordon Kaufman

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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, 05824 MAY-01

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of
BellSouth Telecommunications,
Inc.'s entry into interLATA
services pursuant to Section 271
of the Federal Telecommunications
Act of 1996.

Docket No. 960786-TL

Filed: May 8, 2001

NewSouth Communications Petition to Intervene

NewSouth Communications (NewSouth), pursuant to rule 28-106.205, Florida
Administrative Code, files this Petition to Intervene. As grounds therefor, NewSouth states:

1. The name and address of Petitioner is:

NewSouth Communications
Two North Main Street
Greenville, South Carolina 29609

2. The name, address and telephone number of persons who should receive

copies of all orders, notices and correspondence in this docket are:

Lori Reese
Vice President of Governmental Affairs
NewSouth Communications
Two Main Street
Greenville, South Carolina 29609
(864) 672-5177 (telephone)
(864) 672-5040 (fax)
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DOCUMENT NUMBER-DATE

05824 MAY-80

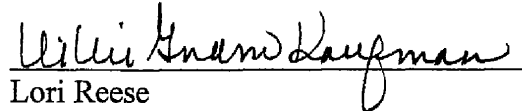
FPSC-RECORDS/REPORTING

3. NewSouth is a competitive provider in Florida certificated to provide competitive local exchange service and long distance service. As a Florida ALEC and IXC, NewSouth has a substantial interest in ensuring that before BellSouth is granted 271 relief, it has fully opened its local markets to competition as required by the Telecommunications Act of 1996. That includes, but is not limited to, providing operational support systems (OSS) that are at parity with the systems BellSouth uses as well as having in place performance measures that adequately track BellSouth's performance and compares that performance to service provided to its retail customers and affiliates.

4. Disputed issues of fact include, but are not limited to, those issues raised by the Florida Competitive Carriers Association (FCCA), in its issue list filed in this docket on April 13, 2001 as supplemented by its revised list distributed at the Issue Identification meeting on April 24, 2001.

5. Ultimate facts alleged include, but are not limited to, the fact that this Commission has a duty to evaluate BellSouth's 271 application in light of the applicable statutes and regulations. Competitive carriers' input as to whether or not BellSouth has opened its market to local competition will be useful to the Commission and help develop the record in this matter.

WHEREFORE, NewSouth moves this Commission to grant its Petition to Intervene and accord it full party status in this matter.



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Attorneys for NewSouth Communications

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing NewSouth Communications Petition to Intervene has been furnished by (*) hand delivery or by U. S. Mail on this 8th day of May, 2001, to the following:

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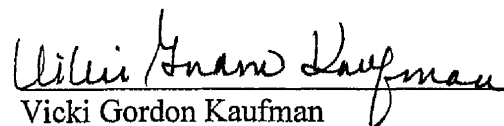
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