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May 29, 2001

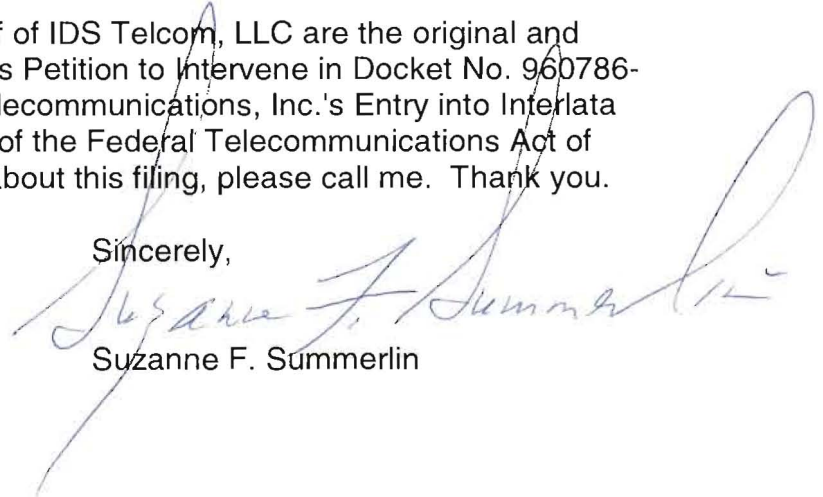
Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, Florida 32399-0850

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RECORDS AND REPORTING

Dear Ms. Bayo:

Enclosed for filing on behalf of IDS Telcom, LLC are the original and fifteen copies of IDS Telcom, LLC's Petition to Intervene in Docket No. 960786-TL, Consideration of BellSouth Telecommunications, Inc.'s Entry into Interlata Services Pursuant to Section 271 of the Federal Telecommunications Act of 1996. If you have any questions about this filing, please call me. Thank you.

Sincerely,



Suzanne F. Summerlin

SFS/mh
Enclosures

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Consideration of BellSouth
Telecommunications, Inc.'s Entry into
Interlata Services Pursuant to Section
271 of the Federal Telecommunications
Act of 1996.
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Docket No.: 960786-TL
Filed: May 29, 2001

IDS TELCOM, L.L.C.'S PETITION TO INTERVENE

IDS Telcom L.L.C. ("IDS"), hereby petitions, pursuant to Rule 28-106.205,
Florida Administrative Code, for leave to intervene in this docket. In support
thereof, IDS states:

- 1. The name and address of Petitioner is:

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

- 2. All notices, pleadings, and other documents in this matter should be
addressed to the following:

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road, Suite 201
Tallahassee, Florida 32301

Statement of Substantial Interests

- 3. IDS is certified by the Florida Public Service Commission
("Commission") as an alternative local exchange company. IDS is both a
competitor of BellSouth Telecommunications, Inc. ("BellSouth") in the provision of
local exchange services in Florida and a customer of BellSouth for unbundled

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FPSC-RECORDS/REPORTING

network elements. If BellSouth is permitted to offer long distance services, this will affect IDS' ability to compete with BellSouth.

4. As a provider of long distance services and a competitor of BellSouth in the provision of local exchange services, IDS' substantial interests will be affected by any Commission decision in this docket regarding whether BellSouth has complied with the requirements of Section 271(c) of the Telecommunications Act of 1996 and whether the Federal Communications Commission should grant BellSouth authority to provide interLATA services.

Disputed Issues of Material Fact

5. IDS is petitioning for leave to intervene in this proceeding for the sole purpose of presenting direct testimony and commercial data and other documentary evidence regarding its business experience with BellSouth's provision of Operational Support Systems ("OSS") and unbundled network elements ("UNEs"). This testimony and evidence is relevant because the purpose of this proceeding is to evaluate whether BellSouth has met the fourteen point "competitive checklist" requirements of Section 271(c)(2)(B) of the Telecommunications Act of 1996. IDS' testimony and evidence will be relevant to whether BellSouth has met the requirements of competitive checklist items 1, 2, and 14, among others. These issues are as follows:

- (a) Checklist item 1 – Has BellSouth provided interconnection in accordance with the requirements of section 251(c)(2) and 252(d)(1) of the Telecommunications Act of 1996?

- (b) Checklist item 2 – Has BellSouth provided nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996?
- (c) Checklist item 14 – Has BellSouth provided telecommunications services for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996?

IDS Desires Full Party Status and the Opportunity to Present Direct Testimony and Evidence Regarding Issues Relevant to this Proceeding

6. IDS recognizes that the Prehearing Officer issued a procedural order in this proceeding, Order No. PSC-01-1025-PCO-TL, on April 25, 2001, referencing Orders Nos. PSC-99-1568-PAA-TP and PSC-00-0104-PAA-TP and excluding certain issues proposed by the Florida Competitive Carriers Association (“FCCA”) and AT&T Communications of the Southern States, Inc. (“AT&T”).

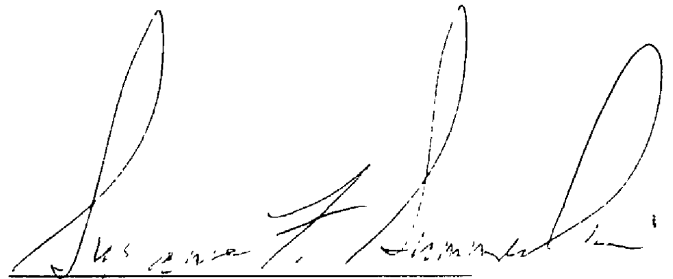
7. IDS also recognizes that the full Commission upheld the Prehearing Officer’s decision when it considered FCCA and AT&T’s Motions for Reconsideration of Order No. PSC-01-1025-PCO-TL at the Commission’s Agenda Conference on May 22, 2001.

8. To the extent the Florida Public Service Commission utilizes the above-referenced orders and decisions of the Commission to preclude IDS’ presentation of such testimony and evidence, these Orders constitute

unpromulgated and invalid rules and the Commission is legally precluded from basing any decision or action on them.

9. If IDS is not permitted to intervene in this proceeding and participate fully by directly presenting its relevant testimony and evidence regarding BellSouth's provision of OSS and UNEs, IDS will challenge the Commission's decisions as unpromulgated and invalid rules in a proceeding at the Division of Administrative Hearings.

WHEREFORE, IDS respectfully requests that the Commission grant its petition for leave to intervene and accord IDS full party status and the opportunity to directly present its relevant testimony and documentary evidence of its commercial experience with BellSouth's provision of OSS and UNEs in the hearing in this proceeding.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of IDS Telcom, L.L.C.'s Petition to Intervene has been furnished by hand delivery(*) or U.S. mail on this 29th day of May 2001, to:

Beth Keating, Esq., Chief
Mary Anne Helton, Esq., Staff Counsel
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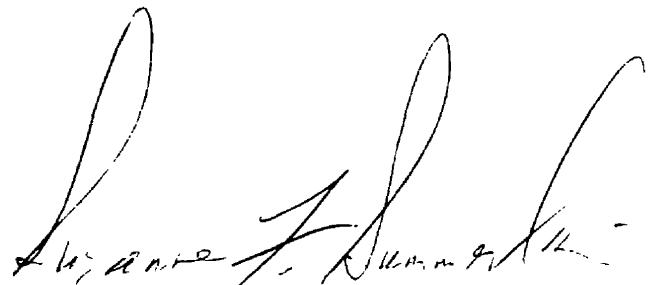
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