

ORIGINAL

MCWHIRTER REEVES
ATTORNEYS AT LAW

RECEIVED-FPSC

01 JUL 18 PM 3:51

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

July 18, 2001

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 NuVox, enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Petition to Intervene of NuVox.

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

- APP _____ VGK/bae
- CAF _____ Enclosure
- CMP _____
- COM 5
- CTR _____
- ECR _____
- LEG 1
- OPC 1
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH Hung

RECEIVED & FILED
RLM
FPSC-BUREAU OF RECORDS

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

DOCUMENT NUMBER-DATE

08760 JUL 18 01

FPSC-COMMISSION CLERK

added 7-20-01

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: July 18, 2001

PETITION TO INTERVENE OF NUVOX COMMUNICATIONS, INC.

NuVox Communications, Inc. (NuVox) 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:

NuVox Communications, Inc.
301 North Main Street
Suite 5000
Greenville, SC 29601-2171

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

Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)
vkaufman@mac-law.com

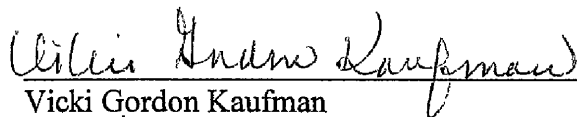
Henry C. Campen, Jr.
Parker, Poe, Adams & Bernstein
First Union Capital Center
150 Fayetteville Street Mail, S-1400
Post Office Box 389
Raleigh, NC 27602
henrycampen@parkerpoe.com

3. NuVox is a competitive provider in Florida certificated to provide competitive local exchange service. As a Florida ALEC, NuVox 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.

4. Disputed issues of fact include those set out in Order No. PSC-01-1025-PCO-TL.

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, NuVox requests that its Petition to Intervene be granted and that it be accorded full party status in this docket.



Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 (telephone)
(850) 222-5606 (fax)
vkaufman@mac-law.com

Henry C. Campen, Jr.
Parker, Poe, Adams & Bernstein
First Union Capital Center
150 Fayetteville Street Mail, S-1400
Post Office Box 389
Raleigh, NC 27602
(919) 890-4145 (telephone)
(919) 834-4564 (fax)
henrycampen@parkerpoe.com

Attorneys for NuVox Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing the Petition to Intervene of NuVox has been furnished by (*) hand delivery or by U. S. Mail on this 18th day of July, 2001, to the following:

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

Jeremy Marcus
Blumenfeld & Cohen
1625 Massachusetts Avenue, NW
Suite 300
Washington DC 20036

Nancy B. White
c/o Nancy Sims
BellSouth Telecommunications, inc.
150 South Monroe Street
Suite 400
Miami Florida 32301

James Falvey
e.spire Communications
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

Michael Gross
Florida Cable Telecommunications
Association
246 E. 6th Avenue
Tallahassee, Florida 32303

Kim Caswell
GTE
Post Office Box 110
FLTC0007
Tampa, Florida 33601

Richard Melson
Post Office Box 6526
Tallahassee, Florida 32314

Scott Sapperstein
Intermedia
One Intermedia Way
MC FLT-HQ3
Tampa, Florida 33619-1309

Donna McNulty
325 John Knox Road
Suite 105
Tallahassee, Florida 32303

Floyd Self/Norman Horton
Messer Law Firm
Post Office Box 1876
Tallahassee, Florida 32302

Pete Dunbar/Karen Camechis
Pennington Law Firm
Post Office Box 10095
Tallahassee, Florida 32301

Susan S. Masterton
Sprint
Post Office Box 2214
MC: FLTLH00107
Tallahassee, Florida 32316-2214

Ken Hoffman
Rutledge Law Firm
Post Office Box 551
Tallahassee, Florida 32302-0551

Andrew Isar
Ascent
3220 Uddenberg Lane, Suite 4
Gig Harbor, WA 98335

Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, Florida 32801

Angela Green, General Counsel
Florida Public Telecommunications Assoc
125 S. Gadsden Street
Suite 200
Tallahassee, Florida 32301-1525

Patrick Wiggins
Katz, Kutter Law Firm
12th Floor
106 East College Avenue
Tallahassee, Florida 32301

John Marks, III
Knowles Law Firm
215 S. Monroe Street
Suite 130
Tallahassee, Florida 32301

Scheffel Wright
Landers Law Firm
Post Office Box 271
Tallahassee, Florida 32302

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Suite 812
Tallahassee, Florida 32399-1400

Rodney L. Joyce
600 14th Street, N.W.
Suite 800
Washington DC 20005-2004

John Kerkorian
MPower
5607 Glenridge Drive, Suite 300
Atlanta, GA 30342

CWA (Orl)
Kenneth Ruth
2180 West State Road 434
Longwood, FL 32779

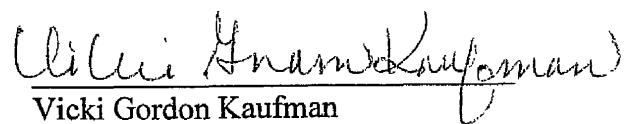
ITC^ DeltaCom
Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343

Network Access Solutions Corporation
100 Carpenter Drive, Suite 206
Sterling, VA 20164

Swidler & Berlin
Richard Rindler/Michael Sloan
3000 K. St. NW #300
Washington, DC 20007-5116

Suzanne F. Summerlin
IDS Telcom L.L.C.
1311-B Paul Russell Road, Suite 201
Tallahassee, Florida 32301

Jim Lamoureux
AT&T Communications, Inc.
1200 Peachtree Street, NE
Room 8068
Atlanta, GA 30309


Vicki Gordon Kaufman