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August 23, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

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COMMISSION
CLERK

Re: Docket No. 010963-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of VoiceStream Wireless ("VoiceStream") are an original and fifteen copies of VoiceStream's Petition for Leave to Intervene.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman
Kenneth A. Hoffman

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Henry Done 8/24/01

DOCUMENT NUMBER-DATE
10506 AUG 23 01
COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Investigation into telephone rate)
center consolidation in the State)
of Florida)
_____)

Docket No. 010963-TP

Filed: August 23, 2001

PETITION OF VOICESTREAM WIRELESS FOR LEAVE TO INTERVENE

VoiceStream Wireless ("VoiceStream"), by and through its undersigned counsel, and pursuant to Rule 25-22.039, Florida Administrative Code, respectfully petitions the Florida Public Service Commission ("Commission") for leave to intervene and permit VoiceStream to participate in this proceeding as a party of record, affording it all applicable rights under Florida law and the rules of the Commission. In support of this Petition, VoiceStream states as follows:

1. Petitioner VoiceStream's full name and its business address are as follows:

VoiceStream Wireless
8100 S.W. 10th Street
Building 3, Suite 1000
Plantation, Florida 33324

2. All pleadings, notices, staff memoranda, orders and other documents and communications filed or served in this proceeding should be served on the following on behalf of VoiceStream:

Michele K. Thomas
VoiceStream Wireless
Manager of Regulatory Numbering Policy
16 Wing Drive
Cedar Knolls, NJ 07927
(973) 290-2566 (Telephone)
(973) 290-2489 (Telecopier)

Kenneth A. Hoffman, Esq.
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DOCUMENT NUMBER-DATE
10506 AUG 23 01
FPSC-COMMISSION CLERK

Anna Miller
Director of Numbering Policy
VoiceStream Wireless
401 9th Street NW
Suite 550
Washington, DC 20004
(404) 579-1852 (Telephone)
(202) 654-5963 (Telecopier)

3. VoiceStream is a facilities based commercial mobile radio service (“CMRS”) provider that utilizes NXX codes in the provision of a full panapoly of wireless telecommunications services throughout Florida. .

4. In *In re: Investigation of Proposed Updates to the Routing Data Base System (RDBS) and Business Rating Input Data Base System (BRIDS) Affecting the Tampa Telecommunications Carriers*, Docket No. 010102, the Commission asked the parties in that proceeding to address the Commission’s authority to order rate center consolidation.

5. In Order No. PSC-01-1577-FOF-TP, issued July 31, 2001 in Docket No. 010102-TP, the Commission deferred its determination concerning the Commission’s authority to order rate center consolidation, and because of the broad statewide impact of the matter, ordered Commission staff to expeditiously open the instant docket to enable the Commission to conduct a more focused analysis of the legal and technical aspects of rate center consolidation.

6. This proceeding will focus on a host of legal, factual and policy issues concerning the consolidation of rate centers, including the extent of the Commission’s authority to order rate center consolidation pursuant to state and federal law, and the impact of rate center consolidation on Florida’s telecommunications providers, including the availability and accessibility of NXX codes. As a facilities based CMRS provider in Florida, VoiceStream utilizes a significant number

of NXX codes and its business interests, including but not limited to the timely availability of NXX codes, will be significantly impacted by any decision the Commission may render regarding rate center consolidation. Thus, the Commission's decisions in this proceeding, which are anticipated to have general applicability, affect VoiceStream's substantial interests, entitling VoiceStream to participate with party status as a matter of law.

WHEREFORE, for the foregoing reasons, VoiceStream respectfully requests that it be granted intervention as a full party in this proceeding.

Respectfully submitted,

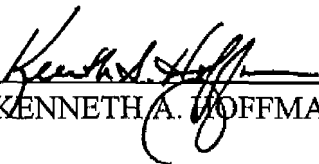


Kenneth A. Hoffman, Esq.
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P. O. Box 551
Tallahassee, FL 32302

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Petition of VoiceStream Wireless for Leave to Intervene was furnished by U. S. Mail to the following this 23rd day of August, 2001:

Patricia Christensen, Esq.
Mary Ann Helton, Esq.
Division of Legal Services
2540 Shumard Oak Boulevard
Room 370
Tallahassee, Florida 32399-0850

By: 
KENNETH A. HOFFMAN, ESQ.

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