



**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into allegations of )  
anti-competitive behaviors and practices )  
of Verizon Florida, Inc. )  
\_\_\_\_\_ )

**Docket No. 011076-TP**

**Filed: September 6, 2001**

**PETITION OF FLORIDA CABLE TELECOMMUNICATIONS**  
**ASSOCIATION FOR LEAVE TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in this docket, and states:

1. The FCTA is a non-profit trade association representing the cable telecommunications industry in Florida, including certificated alternative local exchange carriers (ALECs) providing local exchange telecommunications service in Florida. The FCTA's business address is 246 E. 6<sup>th</sup> Avenue, Suite 100, Tallahassee, FL 32303.

2. The name and address of the person authorized to receive all notices, pleadings and other communications in this docket is:

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
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3. The issues raised in this docket concern allegations of anti-competitive behavior and practices of Sprint-Florida, Inc. The FCTA represents certificated ALECs who provide exchange

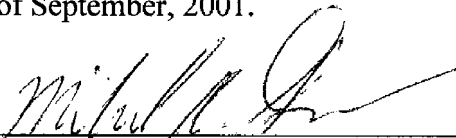
access and local exchange telecommunications services within the territories in which Verizon Florida, Inc. is the Incumbent Local Exchange Carrier. Accordingly, the FCTA's substantial interests will be affected by the outcome of this proceeding to determine whether Verizon Florida, Inc. is engaging in anti-competitive behaviors and practices.

4. As the representative of the interests of its members' certificated telecommunications carriers, the FCTA's intervention is appropriate. The FCTA has actively sought to promote telecommunications competition as a party of record in Commission proceedings for many years and has been granted intervention in numerous dockets which directly impacted its members.

5. The FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple certificated telecommunications carriers it represents.

WHEREFORE, for the foregoing reasons, the FCTA requests that the Commission grant its Petition for Intervention, and afford the FCTA full party status in this proceeding.

Respectfully submitted this 6 day of September, 2001.



Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition of Florida Cable Telecommunications Association for Leave to Intervene in Docket 011076-TP has been served upon the following parties by U.S. Mail this 6 day of September, 2001:

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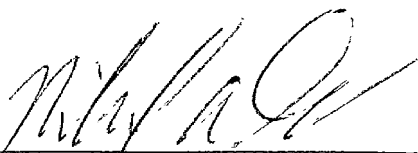
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