



ORIGINAL

Florida Cable Telecommunications Association

Steve Wilkerson, President

VIA HAND DELIVERY

September 6, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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COMMISSION
CLERK

RE: Docket No. 011077-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Petition of Florida Cable Telecommunications Association for Leave to Intervene.

Copies of the Petition to Intervene have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

Michael A. Gross
Vice President, Regulatory Affairs &
Regulatory Counsel

- APP
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- LEG cc: All Parties of Record
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Flg R.v.v 9-10-01

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Investigation into allegations of)
anti-competitive behaviors and practices)
of BellSouth Telecommunications, Inc.)
_____)**

Docket No. 011077-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. 6th 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
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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

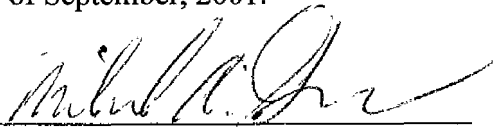
access and local exchange telecommunications services within the territories in which BellSouth Telecommunications, Inc. is the Incumbent Local Exchange Carrier. Accordingly, the FCTA's substantial interests will be affected by the outcome of this proceeding to determine whether BellSouth Telecommunications, 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
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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 011077-TP has been served upon the following parties by U.S. Mail this 6 day of September, 2001:

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Ms. Nancy B. White
c/o Ms. Nancy H. Sims
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