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September 10, 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:

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01 SEP 10 PM 4:33
COMMISSION
CLERK

On behalf of Z-Tel Communications, Inc. (Z-Tel), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Z-Tel Communications, Inc.'s Petition to Intervene.

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

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FPSC-COMMISSION CLERK

One 9/12/01

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: September 10, 2001

Z-Tel Communications, Inc.'s Petition to Intervene

Z-Tel Communications, Inc. (Z-Tel), pursuant to rule 28-106.205, Florida
Administrative Code, files this Petition to Intervene. As grounds therefor, Z-Tel states:

1. The name and address of Petitioner is:

Z-Tel Communications, Inc.
601 South Harbor Island Boulevard
Suite 220
Tampa, Florida 33602

2. The name, address and telephone number of persons who should receive

copies of all orders, notices and correspondence in this docket are:

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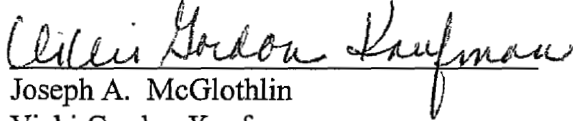
Peggy Rubino
Z-Tel Communications, Inc.
601 South Harbor Island Boulevard
Suite 220
Tampa, Florida 33602

3. Z-Tel is a competitive provider in Florida certificated to provide competitive local exchange service. As a Florida ALEC, Z-Tel 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. That includes, but is not limited to, providing operational support systems (OSS) that are at parity with the systems BellSouth uses as well as having in place performance measures that adequately track BellSouth's performance and compares that performance to service provided to its retail customers and affiliates.

4. Disputed issues of fact include, but are not limited to, those issues set forth 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, Z-Tel moves this Commission to grant its Petition to Intervene and accord it full party status in this matter.



Joseph A. McGlothlin

Vicki Gordon Kaufman

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Attorneys for Z-Tel Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Z-Tel Communications Inc.'s Petition to Intervene has been furnished by (*) hand delivery or by U. S. Mail on this 10th day of September, 2001, to the following:

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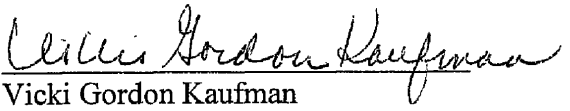
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