

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into anti-competitive Behaviors and practices of BellSouth Telecommunications, Inc.

Docket No. 011077-TL

Filed: October 1, 2001

Network Telephone Corporation's Petition to Intervene

Network Telephone Corp. (NTC), pursuant to rule 28-106.205, Florida Administrative Code, files this Petition to Intervene. As grounds therefor, NTC states:

- 1. The name and address of Petitioner is:

Network Telephone Corp.
815 South Palafox Street
Pensacola, FL 32501

- 2. The name, address, and telephone number of persons who should receive copies of all orders, notices, and correspondence in this docket is:

Brent E. McMahan
Vice President-Regulatory & Governmental Affairs
Network Telephone Corp.
815 South Palafox Street
Pensacola, FL 32501
(850) 465-1744
(850) 432-0218
brent.mcmahan@networktelephone.net

- 3. Network Telephone is a competitive provider in Florida certificated to provide competitive local exchange service. As a Florida ALEC, NTC has substantial interest in ensuring that anti-competitive practices in the Florida telecommunications market are identified and eliminated. NTC desires to limit the purpose of its intervention to monitoring the docket. It will not be actively participating by filing testimony, filing interrogatories, etc.

- 4. Disputed issues of fact include, but are not limited to, what anticompetitive practices, if any, are occurring in the marketplace.

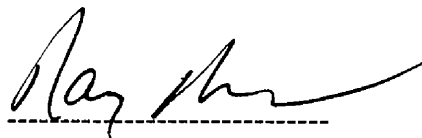
- 5. Ultimate facts alleged include, but are not limited to, the fact that this Commission has a duty to eliminate anti-competitive practices so as to facilitate local competition.

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Wherefore, NTC moves this Commission grant its Petition to Intervene and accord it monitoring status in this matter.

A handwritten signature in black ink, appearing to read "Ray Russenberger", written over a horizontal dashed line.

Ray Russenberger
President & CEO
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501
850-432-4855
850-470-9641 fax
ray.russenberger@networktelephone.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Network Telephone Petition to Intervene has been furnished by U.S. mail on this October 3, 2001, to the following:

BellSouth Telecommunications, Inc.
Ms. Nancy B. White
c/o Ms. Nancy H. Sims
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: 222-8640
Email: nancy.sims@bellsouth.com



Brent E. McMahan