



October 16, 2001

VIA OVERNIGHT MAIL

Ms. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

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01 OCT 17 AM 9:05  
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01 OCT 17 AM 10:05

Re: ITC^DeltaCom Communications, Inc. – Petition to Intervene  
Docket No. 011077-TL

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom Petition to Intervene in Docket No. 011077-TL.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same in the enclosed self-addressed stamped envelope.

I have also enclosed the Affidavit of Nanette Edwards, together with the letter from Jerry Watts requesting that Nanette Edwards be named qualified representative of ITC^DeltaCom in the above referenced docket.

Should you have any questions, please do not hesitate to contact me at (256) 382-7090.

Sincerely,

ITC^DELTACOM COMMUNICATIONS, INC.  
d/b/a ITC^DELTACOM

Leigh Ann Wooten  
Regulatory Manager

Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS DOCUMENT NUMBER-DATE

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Handwritten notes: Hong Done 10/19/01

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 011077-TL

Filed: October 17, 2001

**PETITION TO INTERVENE**  
**OF ITC^DELTA COM COMMUNICATIONS, INC.**  
**d/b/a ITC^DELTA COM**

COMES NOW, ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom (“ITC^DeltaCom”) and, pursuant to Rule 25-22.039, Florida Administrative Code, respectfully petitions to intervene in the above-referenced proceeding. In support of its Petition, ITC^DeltaCom states as follows:

1. ITC^DeltaCom is a competitive local exchange carrier with its corporate headquarters located at 1791 O.G. Skinner Drive, West Point, Georgia 31833. ITC^DeltaCom has authorization to provide competitive local exchange services in Florida pursuant to its CPCN: Docket No. 980352-TX Order No. PSC-98-0646A-FOF-TX.

2. Accordingly, ITC^DeltaCom is subject to the rules, regulations, and orders of the Commission, and such rules, regulations, and orders impact ITC^DeltaCom in the provision of telecommunications services in Florida and ITC^DeltaCom's ability to compete.

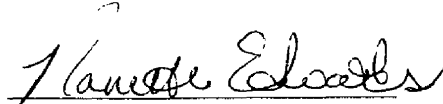
3. As a Florida ALEC, ITC^DeltaCom has a substantial interest in ensuring that anticompetitive practices in the Florida telecommunications market are eliminated.

4. Thus, the rights and interests of ITC^DeltaCom may be substantially affected by any decisions and orders of the Commission pursuant to this proceeding.

5. No other party can adequately represent ITC^DeltaCom's interests.

**WHEREFORE**, ITC^DeltaCom respectfully requests that the Commission grant the Petition to Intervene in full allowing ITC^DeltaCom to participate fully as a party of record including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

Respectfully submitted,

A handwritten signature in cursive script that reads "Nanette Edwards". The signature is written in black ink and is positioned above the printed name.

Nanette Edwards  
Director of Regulatory Advocacy & Sr. Atty.  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
PH: (256) 382-3856  
FAX: (256) 382-3969

## CERTIFICATE OF SERVICE

This is to certify that I have served copies of the Petition to Intervene of ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom upon the following parties of record by first class mail, this 16th day of October, 2001.

*AT&T (GA)*  
*Jim P. Lamoureux, Esq.*  
*1200 Peachtree St., NE*  
*Suite 8100*  
*Atlanta, GA 30309*  
*Phone: 404-810-4196*  
*Fax: 404-877-7648*

*BellSouth Telecommunications, Inc.*  
*Ms. Nancy B. White*  
*c/o Ms. Nancy H. Sims*  
*150 South Monroe Street, Suite 400*  
*Tallahassee, FL 32301-1556*  
*Phone: (850) 224-7798*  
*Fax: 222-8640*

*Covad Communications Company*  
*Catherine F. Boone*  
*10 Glenlake Parkway, Suite 650*  
*Atlanta, GA 30328-3495*  
*Phone: (678) 579-8388*  
*Fax: (678) 320-9433*

*Florida Cable Telecomm. Assoc., Inc.*  
*Michael A. Gross*  
*246 E. 6th Avenue, Suite 100*  
*Tallahassee, FL 32303*  
*Phone: 850-681-1990*  
*Fax: 681-9676*

*Florida Digital Network, Inc.*  
*Mr. Matthew Feil*  
*390 North Orange Avenue, Suite 2000*  
*Orlando, FL 32801-1640*  
*Phone: (407) 835-0460*  
*Fax: (407) 835-0309*

*Florida Public Telecommunications*  
*Assoc.*  
*Angela Green, General Counsel*  
*2292 Wednesday Street*  
*Suite 1*  
*Tallahassee, FL 32308-4334*  
*Phone: 850-222-5050*  
*Fax: 222-1355*

*McWhirter Law Firm*  
*Vicki Kaufman*  
*117 S. Gadsden St.*  
*Tallahassee, FL 32301*  
*Phone: 850-222-2525*  
*Fax: 222-5606*

*Messer Law Firm*  
*Norman H. Horton, Jr.*  
*P.O. Box 1876*  
*Tallahassee, FL 32302*  
*Phone: 850-222-0720*  
*Fax: 224-4359*

*Network Telephone Corporation*  
*Brent E. McMahan*  
*815 South Palafox Street*  
*Pensacola, FL 32501-5937*  
*Phone: (850) 465-1744*  
*Fax: (850) 432-0218*

*NewSouth Communications Corp.*  
*Ms. Lori Reese*  
*NewSouth Center*  
*Two North Main Street*  
*Greenville, SC 29601-2719*  
*Phone: (864) 672-5177*  
*Fax: (864) 672-5105*

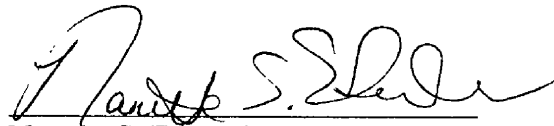
*Pennington Law Firm*  
*Peter Dunbar/Karen Camechis*  
*P.O. Box 10095*  
*Tallahassee, FL 32301*  
*Phone: 850-222-3533*  
*Fax: 222-2126*

*Supra Telecommunications &*  
*Information Systems, Inc.(Mia)*  
*Brian Chaiken*  
*2620 S.W. 27th Avenue*  
*Miami, FL 33133*  
*Phone: 305-476-4248*  
*Fax: 305-443-9516*

*Supra Telecommunications and  
Information Systems, Inc.  
Ms Ann H. Shelfer  
Koger Center - Ellis Building  
1311 Executive Center Drive, Suite 200  
Tallahassee, FL 32301-5027  
Phone: (850) 402-0510  
Fax: 402-0522*

*Time Warner Telecom of Florida, L.P.  
c/o Ms. Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069-4002  
Phone: (615) 376-6404  
Fax: (615) 376-6405*

*XO Florida, Inc.  
Ms. Dana Shaffer  
105 Molloy Street, Suite 100  
Nashville, TN 37201-2315  
Phone: (615) 777-7700  
Fax: (615) 345-1564*

A handwritten signature in cursive script, appearing to read "Nanette S. Edwards", written over a horizontal line.

Nanette S. Edwards, Esq.