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COMMISSION

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

Re: ITC^DeltaCom Communications, Inc. – Petition to Intervene

Docket No. 011075-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. 011075-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,

APP

ITC^DELTACOM COMMUNICATIONS, INC.

d/b/a ITC/DELTACOM

Leigh Ann Wooten Regulatory Manager

Enclosures

FPSC-WUREAU OF RECORDS

DOCUMENT NUMBER - DATE

13175 OCT 175

FPSC-COHMISSION CLERK

Dars 10/10/01

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into allegations of)	Docket No. 011075-TL
anti-competitive behaviors and practices)	
of Sprint-Florida Incorporated)	Filed: October 17, 2001

PETITION TO INTERVENE OF ITC^DELTACOM COMMUNCIATIONS, INC. d/b/a ITC^DELTACOM

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,

Nanette Edwards

Director of Regulatory Advocacy & Sr. Atty.

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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.

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Sprint-Florida, Incorporated

Mr. F. B. (Ben) Poag

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Nanette S. Edwards, Esq.