

# MCWHIRTER REEVES

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TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

January 8, 2002

## 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.: 011077-TL

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association's, enclosed for filing and distribution are the original and 15 copies of the following:

Florida Competitive Carriers Association'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

VGK/bae Enclosure

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RECEIVED & FILED FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A.

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into whether competitive practices of incumbent and alternative local exchange carriers comply with Section 364.01(4)(g), F.S.

Docket No.: 011077-TL

Filed: January 8, 2002

# Florida Competitive Carriers Association's Petition to Intervene

Florida Competitive Carriers Association (FCCA), pursuant to rule 28-106.205, Florida Administrative Code, files this Petition to Intervene. As grounds therefore, FCCA states:

1. The name and address of Petitioner is:

Florida Competitive Carriers Associations c/o Brian Sulmonetti
Concourse Corporate Center Six
Six Concourse Parkway, Suite 3200
Atlanta, Georgia 30328
(770) 284-5493 (telephone)
(770) 284-5488 (telefax)
Brian Sulmonetti@wcom.com

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

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Decker Kaufman Arnold & Steen, PA
117 South Gadsden Street
Tallahassee, Florida 32301
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DOCUMENT NUMBER - DATE

- 3. <u>Statement of Substantial Interests</u>. The FCCA is an industry association, the principal objective of which is to advocate policies that will foster competition in all telecommunications markets. Many of FCCA's members hold certificates to operate as ALECs in Florida. In this docket, the Commission will consider how to eliminate anticompetitive behavior in the Florida marketplace so as to facilitate competition in the local exchange market. The decision of the Commission will affect FCCA members' businesses and their competitive posture. The formulation, evaluation, and advocacy of policy positions in this area fall within the scope of activities that are appropriate for the FCCA to carry out on behalf of its members.
- 4. <u>Disputed Issues of Fact</u>. Disputed issues of fact include, but are not limited to, what anticompetitive practices, are occurring in the marketplace today.
- 5. <u>Ultimate Facts Alleged</u>. Ultimate facts alleged include, but are not limited to, the fact that this Commission has a duty to eliminate anticompetitive practices so as to facilitate local competition.

WHEREFORE, FCCA moves this Commission to grant its Petition to Intervene and accord it full party status in this matter.

Joseph A. McGlothlin

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Attorneys for Florida Competitive Carriers Association

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Competitive Carriers Association's Petition to Intervene has been furnished by (\*) hand delivery or by U. S. Mail on this <u>8th</u> day of January, 2002, to the following:

(\*) Beth Keating Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

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Vicki Gordon Kaufman