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ORIGINAL

January 9, 2002

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COMMISSION
CLERK

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Re: Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Petition to Intervene.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

Enclosures

cc: All Parties of Record

APP
CAF
CMP
COM
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ECR
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None Done 1/14/02

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DOCUMENT NUMBER-DATE

00282 JAN-98

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate methods
to compensate carriers for exchange of
traffic subject to Section 251 of the Telecom-
munications Act of 1996

DOCKET NO. 000075-TP
FILED: 01/09/02

PETITION TO INTERVENE

ALLTEL Florida, Inc. ("ALLTEL"), pursuant to Rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefor states:

1. ALLTEL is an incumbent local exchange carrier ("ILEC") company lawfully doing business in the State of Florida pursuant to certificates issued by the FPSC. ALLTEL is a small local exchange company within the meaning of Section 364.052(1), Florida Statutes, and a rural "local exchange carrier with fewer than 2 percent of the nations subscriber lines" ("Rural Carrier") within the meaning of Section 251(f)(2) of the federal Telecommunications Act of 1996 ("the Act").¹

2. ALLTEL's principal place of business in Florida is Live Oak, Florida. Pleadings, orders, notices and other papers filed or served in this matter should be served upon:

Stephen T. Refsell and
Bettye Willis
ALLTEL Corporate Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

J. Jeffrey Wahlen
Ausley & McMullen
P. O. Box 391
Tallahassee, FL 32302


¹ Sections of the Act are codified throughout scatter subsections of 47 U.S.C. §§ 153, 252(a) and 252(b) (2001).

3. Issue number 13 in this docket is intended to establish a generic definition for "local calling area" for purposes of reciprocal compensation and has been set for hearing in the second quarter of 2002. The definition of "local calling area" for purposes of reciprocal compensation is also currently pending in an arbitration between ALLTEL and a competitive local exchange carrier in Docket No. 011354-TP.

4. ALLTEL has taken a position on the definition of "local calling area" in Docket No. 011354-TP that it believes should be adopted without regard to ALLTEL's status as a Rural Carrier. However, in the event the Commission declines to adopt ALLTEL's position without regard to ALLTEL's status as a Rural Carrier, ALLTEL has petitioned the Commission in Docket No. 011354-T and pursuant to Section 251(f)(2) of the Act to suspend or modify the general requirements of the Act to reflect the unique economic and technical circumstances of Rural Carriers. The proceeding in this docket will affect the substantial interests of ALLTEL because this proceeding will determine the general rule for the definition of "local calling area" and whether and how ALLTEL will need to pursue its petition for suspension or modification of that general rule in Docket No. 011354-TP.

WHEREFORE, ALLTEL respectfully requests that the Commission grant the Company leave to intervene for all legal purposes in this docket.

Respectfully submitted this 9th day of January, 2002.



J. JEFFRY WAHLEN
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
850/425-5471

and

STEPHEN T. REFSELL
ALLTEL Corporate Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

ATTORNEYS FOR ALLTEL FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 9th day of January 2002, to the following:

Mary Beth Keating/Felicia Banks *
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Allegiance Telecom of Florida, Inc.
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Allegiance Telecom
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AT&T
Marsha Rule
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549

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Suzanne Ockleberry/James Lamoureux
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BellSouth Telecommunications, Inc.
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c/o Nancy H. Sims
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Tallahassee, FL 32301-1556

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Tallahassee, FL 32301

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Time Warner Telecom of Florida, L.P.
Carolyn Marek
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Franklin, TN 37069

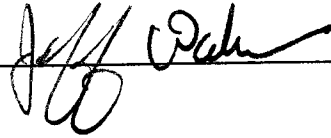
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XO Florida, Inc.
Dana Shaffer
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Attorney

A handwritten signature in black ink, appearing to read "Jeff Palm", is written over a horizontal line. The signature is stylized and cursive.

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