

JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
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(305) 347-5561

January 14, 2002

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: **Docket No. 011665-TI**  
**(American Bell Telecommunication)**

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition for Leave to Intervene, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



James Meza III (KA)

cc: Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

DOCUMENT NUMBER-DATE

00482 JAN 14 2002

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 011665-TI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
U.S. Mail this 14th day of January, 2002 to the following:

Beth Keating  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

American Bell Telecommunication  
824 N.W. 183rd Street  
Miami, FL 33169-4252  
Tel. No. (305) 770-9340  
Fax. No. (305) 770-9390

  
James Meza III (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate to ) Docket No.: 011665-TI  
provide Interexchange )  
Telecommunications Service by Mycom )  
Ins Agency Corp. d/b/a American Bell )  
Telecommunication )  
\_\_\_\_\_ ) Filed: January 14, 2002

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
PETITION FOR LEAVE TO INTERVENE**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rule 25-22.039, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefore states:

1. BellSouth is a telephone company lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.

2. BellSouth's principal place of business in Florida is 150 W. Flagler Street, Suite 1910, Miami, Florida 33130. Pleadings and process in this matter may be served upon:

Nancy B. White  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, Florida 32301

3. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of BellSouth and its business operations

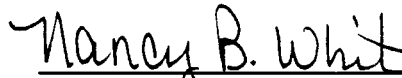
in the State of Florida because granting Petitioner's application will cause customer confusion due to Petitioner's use of BellSouth's trademark.

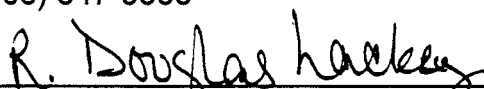
4. The Commission previously granted BellSouth's Petition to Intervene in a similar proceeding (Docket No. 980918-TC), wherein an applicant attempted to improperly use BellSouth's trademarks.

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

Respectfully submitted this 14th day of January, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE (KA)  
JAMES MEZA III  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
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\_\_\_\_\_  
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