

NETWORK PLUS
Business Communicating.

Via Overnight Delivery

January 14, 2002

Ms. Blanca Bayo
Florida Public Service Commission
Division of Records and Reporting
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0872

RE: Investigation into Pricing of Unbundled Network Elements. Docket No. 990649A-TP


Dear Ms. Bayo:

Enclosed are an original and fifteen (15) copies of the *Motion for Leave to Intervene of Network Plus, Inc.* in the above referenced proceeding.

Thank you for your attention to this matter. Questions should be directed to the undersigned.

Sincerely,

Network Plus, Inc.


Dena Alo-Colbeck for Lisa Korner Butler
Enclosures

DOCUMENT NUMBER DATE

00559 JAN 15 02

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into Pricing of)	Docket No. 990649A-TP
Unbundled Network Elements)	
_____)	Filed:

**MOTION FOR LEAVE TO INTERVENE
OF NETWORK PLUS, INC.**

Network Plus, Inc., pursuant to Florida Public Service Commission Rules of Practice and Procedure, Florida Administrative Code (F.A.C.) §25-22.039, hereby respectfully moves the Florida Public Service Commission for leave to intervene in the above-captioned proceeding. In support of its application, Network Plus states as follows:

1. Network Plus is a certificated provider of alternative local exchange and competitive interexchange services within the state of Florida.
2. As a competitive local and interexchange telecommunications service provider serving Florida subscribers, Network Plus has a substantial and material interest in the matters raised in this proceeding. Network Plus purchases unbundled network elements (“UNEs”) from BellSouth to serve subscribers in Florida and elsewhere. The expressed intent of this docket is to examine the recurring and non-recurring UNE rates. Any decision made by the Commission during this proceeding could substantially affect the interests of Network Plus and its ability to conduct business in the State of Florida. Network Plus is concerned that its rights and interests cannot be adequately represented by any other party in this docket.
3. Network Plus wishes to intervene for the specific purpose of monitoring this proceeding and submitting a post-hearing brief, as appropriate. Network Plus recognizes that the record in this proceeding is well developed to date through the filing of prehearing statements and testimony. Network Plus accepts the record to date. Network Plus does not intend to sponsor witnesses, introduce new evidence, or otherwise broaden the issues involved in this proceeding.

Network Plus' intervention will not prejudice other parties or cause any delay in the resolution of this proceeding.

4. The name and address of the individuals to receive documents and communications regarding this proceeding are:

Lisa Korner Butler
Vice President—Regulatory & Industry Affairs
Network Plus, Inc.
41 Pacella Park Drive
Randolph, MA 02368
Telephone: 781.473.2977
Facsimile: 781.473.3972
Email: lkorner@nwp.com

-and-

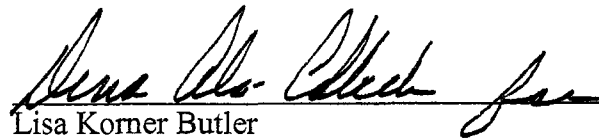
Andrew O. Isar
Dena Alo-Colbeck
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335
Telephone: 253.851.6700
Facsimile: 253.851.6474
Email: dalocolbeck@millerisar.com

WHEREFORE, Network Plus respectfully requests that the Commission grant its Petition for Leave to Intervene in this proceeding.

Respectfully submitted,

Network Plus, Inc.

BY:



Lisa Korner Butler
Vice President—Regulatory & Industry Affairs
Network Plus, Inc.
41 Pacella Park Drive
Randolph, MA 02368
Telephone: 781.473.2977
Facsimile: 781.473.3972
Email: lkorner@nwp.com

10 January 2002

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of) Docket No. 990649A-TP
Unbundled Network Elements)

CERTIFICATION

This is to certify that on January 14, 2002, an original and fifteen (15) copies of the *Motion For Leave to Intervene of Network Plus, Inc.* have been sent via overnight delivery to Ms. Blanca Bayo, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0872, and copies of the foregoing have been mailed via first class mail, postage prepaid, to:

ALLTEL Communications Services,
Inc.
One Allied Drive
Little Rock, AR 72203-2177

AT&T Communications of the Southern
States, Inc.
Marsha Rule
101 N. Monroe St., #700
Tallahassee, FL 32301

AT&T Communications of the Southern
States, Inc. (GA)
Jim Lamoureux/Virginia Tate
1200 Peachtree St., Suite 8068
Atlanta, GA 30309

Ausley Law Firm
Jeffrey Wahlen/John Fons
P.O. Box 391
Tallahassee, FL 32302

BellSouth Telecommunications, Inc.
Nancy B. White/Patrick Turner
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

BlueStar Networks, Inc.
Norton Cutler/Michael Bressman
5 Corporate Centre
801 Crescent Centre Drive, Suite 600

Franklin, TN 37067

Broadslate Networks of Florida, Inc.
John Spilman
675 Peter Jefferson Parkway, Suite 310
Charlottesville, VA 22911

Covad Communications Company
Ms. Catherine F. Boone
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328-3495

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Florida Competitive Carriers Assoc.
c/o McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301

Florida Digital Network, Inc.
390 North Orange Ave., Suite 2000
Orlando, FL 32801

Florida Public Telecommunications
Assoc.
Angela Green, General Counsel
2292 Wednesday Street, Suite 1

Tallahassee, FL 32308-4334

Holland Law Firm
Bruce May
P.O. Drawer 810
Tallahassee, FL 32302

Hopping Law Firm
Richard Melson/Gabriel E. Nieto
P.O. Box 6526
Tallahassee, FL 32314

Intermedia Communications, Inc.
MCI WorldCom
Ms. Donna C. McNulty
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

KMC Telecom Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043

Katz, Kutter Law Firm
Charles Pellegrini/Patrick Wiggins
106 East College Avenue, 12th Floor
Tallahassee, FL 32301

Kelley Law Firm
Genevieve Morelli/Eric Jenkins
Jonathan Canis/Michael Hazzard
1200 19th St. NW, Fifth Floor
Washington, DC 20036

MCI WorldCom, Inc.
Mr. Brian Sulmonetti
Concourse Corporate Center Six
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

MediaOne Florida Telecommunications,
Inc.
c/o Laura L. Gallagher, P.A.
101 E. College Ave., Suite 302
Tallahassee, FL 32301

Messer Law Firm
Norman Horton/Floyd Self/Tracy Hatch
215 South Monroe Street, Suite 710
Tallahassee, FL 32302-1876

Network Access Solutions Corporation
Mr. Don Sussman
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

Network Telephone Corporation
Brent E. McMahan
815 South Palafox Street
Pensacola, FL 32501-5937

Office of Public Counsel
Stephen C. Reilly
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Pennington Law Firm
Marc W. Dunbar
P.O. Box 10095
Tallahassee, FL 32302

SBC Telecom, Inc.
Mark Ortlieb
130 E. Travis, Rm. 5-K-03
San Antonio, TX 78205

Shook, Hardy & Bacon LLP
Rodney L. Joyce
600 14th Street, N.W., Suite 800
Washington, DC 20005-2004

Sprint-Florida, Incorporated
Charles J. Rehwinkel
1313 Blairstone Road
Tallahassee, FL 32301-3021

Supra Telecommunications and
Information Systems, Inc.
Mark E. Buechele
Koger Center - Ellis Bldg.

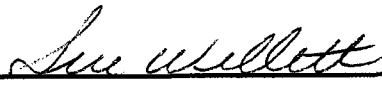
1311 Executive Center Dr., Suite 200
Tallahassee, FL 32301-5027

Swidler & Berlin
Michael Sloan
3000 K St. NW, #300
Washington, DC 20007-5116

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

Verizon Select Services Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Z-Tel Communications, Inc.
George S. Ford
601 S. Harbour Island Blvd.
Tampa, FL 33602-5706



Sue Willett