

March 8, 2002

VIA OVERNIGHT DELIVERY

Mr. Walter D'Haeseleer
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Petition to Intervene – Docket No. 990649B-TP

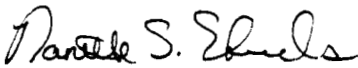
Dear Mr. D'Haeseleer:

I am enclosing for filing with the Commission, an original and fifteen (15) copies of ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom's Petition to Intervene.

Please return a date-stamped receipt copy of this filing labeled "return receipt" to me in the enclosed self-addressed, stamped envelope.

Should you have any questions regarding this filing, please contact me. at 256-382-3850.

Sincerely,



Nanette S. Edwards
Director – Regulatory, Sr. Attorney

/nse

Enclosure: 1

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DIVISION OF
COMPETITIVE SERVICES

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In Re: Investigation into pricing of unbundled)
Network elements (Sprint/Verizon track))
)
) Docket No. 990649B-TP
)
)
)

PETITION OF ITC^DELTACOM
COMMUNICATIONS, INC. TO INTERVENE

COMES NOW ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom") by its undersigned counsel, and pursuant to Commission Rule 25-22.039, hereby moves for leave to intervene in this case. In support of the Petition to Intervene, ITC^DeltaCom respectfully states as follows:


1. ITC^DeltaCom is an Alabama corporation with its headquarters located at 1791 O.G. Skinner Drive, West Point, Georgia 31833. On November 20, 1996 ITC^DeltaCom was certified to provide competitive local exchange services within the state of Florida pursuant to Certificate No. 4764. ITC^DeltaCom is currently providing such local services within the state of Florida.

2. ITC^DeltaCom's interests will be substantially affected by the outcome of this proceeding as ITC^DeltaCom purchases services from Sprint and Verizon in Florida.

3. ITC^DeltaCom would be severely prejudiced if intervention is denied because it will be bound by the decision in this matter without any opportunity to participate in the hearing.
4. The interests of ITC^DeltaCom may not be adequately represented by other parties in the case.

WHEREFORE, ITC^DeltaCom respectfully requests that the Commission grant its Petition to Intervene in full.

Respectfully submitted,



Nanette Edwards
Director – Regulatory, Sr. Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
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Counsel for ITC^DeltaCom Communications,
Inc.

Dated: March 8, 2002

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Intervene of ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom was furnished by U.S. Mail, Certified Return Receipt Requested. this 8th day of March 2002, to

Nancy White
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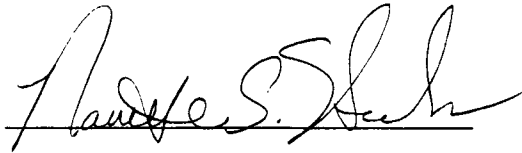
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A handwritten signature in black ink, appearing to read "Nanette S. Edwards", written over a horizontal line.

Nanette S. Edwards