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April 16, 2002

VIA HAND DELIVERY

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COMMISSION
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Re: Docket No.: 011077-TL

Dear Ms. Bayo:

On behalf of ACCESS Integrated Networks, Inc., enclosed for filing and distribution are the original and 15 copies of ACCESS Integrated Networks, Inc.'s Petition to Intervene.

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Joe McGlothlin
Joseph A. McGlothlin

JAM/mls
Enclosure

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R.V.N 4/18/02

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Digital Network,
Inc., for Expedited Review and Cancellation
of BellSouth Telecommunication Inc.'s
Key Customer Promotional Tariffs
and for an Investigation of BellSouth
Telecommunication Inc.'s Promotional
Pricing and Marketing Practices.

Docket No. 011077-TL

Filed: April 16, 2002

ACCESS INTEGRATED NETWORKS, INC.'S PETITION TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, ACCESS Integrated Networks,
Inc. ("ACCESS"), through its undersigned counsel, submits its Petition to Intervene and states:

1. The name and address of the Petitioner is:

ACCESS Integrated Network, Inc.
4885 Riverside Drive, Suite 101
Macon, Georgia 31210

2. Copies of all pleadings, notices, and orders in this Docket should be provided to:

Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 S. Gadsden Street
Tallahassee, Florida 32301

Rodney Page
ACCESS Integrated Networks, Inc.
4885 Riverside Drive, Suite 101
Macon, Georgia 31210

3. Statement of affected interests: ACCESS is a competitive provider of telecommunications services in Florida. ACCESS holds a certificate that authorizes it to provide competitive local exchange service. As a Florida ALEC, ACCESS is a direct competitor of BellSouth Telecommunications, Inc. ("BellSouth") and as such its substantial interests are effected

by anti-competitive conduct by BellSouth. ACCESS submits that its interests will be affected by the Commission's determination in this proceeding.

4. Disputed issues of material fact in this proceeding include, but are not limited to:

a. Whether BellSouth is engaging in anti-competitive practices and behaviors in Florida through its promotional pricing and marketing practices contained in BellSouth's "2002 Key Customer" tariff.

b. The actions, if any, which the Commission should take to afford appropriate remedies for anti-competitive practices and behaviors committed by BellSouth.

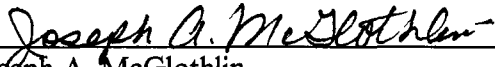
5. Petitioners adopt and incorporate by reference the ultimate facts supporting relief alleged by FDN in FDN's Petition for an Investigation of BellSouth's Promotional Pricing and Marketing Practices and Cancellation of BellSouth's Key Customer Promotional Tariffs and For an Investigation of BellSouth's Promotional Marketing Practices filed February 14, 2002, subject to further development through discovery and testimony in this proceeding.

6. The petitioners are entitled to relief pursuant to, but not limited to, the following: Sections 364.01(a), (c) and (g); 364.051(5); 364.08; 364.09 and 364.10, Florida Statutes.

7. Granting ACCESS leave to intervene in this docket will provide the Commission with greater insight into the problems encountered by ALECs in the marketplace, as well as provide ACCESS the opportunity to seek redress for BellSouth's anti-competitive behavior. Any determinations and actions in this docket regarding BellSouth's anti-competitive behavior and practices will affect the substantial interests of ACCESS as an ALEC in Florida. Moreover, such interests are precisely those which the cited statutes are designed to protect. Thus, the petitioners have standing under Chapter 120, Florida Statutes and applicable rules to be granted intervention in

this proceeding.

WHEREFORE, ACCESS Integrated Networks, Inc. requests the Commission to enter an Order authorizing it to intervene as a full party to this proceeding.



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Attorneys for ACCESS Integrated Networks, Inc.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing ACCESS Integrated Networks, Inc.'s Petition to Intervene has been furnished by (*) hand delivery or by U. S. Mail on this 16th day of April 2002 to the following:

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

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