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A PROFESSIONAL ASSOCIATION

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May 10, 2002



**BY HAND DELIVERY** 

Ms. Blanca Bayó, Director The Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 010963-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are the following documents:

1. An original and fifteen copies of ITC^DeltaCom Communications, Inc.'s Petition to 05091-02Intervene; and

2. An original and fifteen copies of ITC^DeltaCom Communications, Inc.'s Comments. 05092-02

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

AUS Fordham CMP COM CTR ECR GCL OPC MMS TWH/amb SEC Enclosures Nanette Edwards, Esq.

Sincerely yours,

Tracy W. Hatch

RECEIVED RECORDS

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Investigation into Telecommunications Rate Center Consolidation in the State of Florida

Docket No. 010963-TP Filed: May 10, 2002

## **PETITION TO INTERVENE**

ITC^DELTACOM COMMUNICATIONS, INC., d/b/a ITC^DELTACOM ("ITC^DeltaCom"), pursuant to Rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefore states:

1. ITC^DeltaCom is a telecommunications 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. ITC^DeltaCom's principal place of business is 1791 O.G. Skinner Driver, West Point, Georgia 31833. Pleadings, orders, notices and other papers filed or served in this matter should be served upon:

Nanette Edwards, Esq. Director –Regulatory 4092 S. Memorial Parkway Huntsville, AL 35802 Floyd Self, Esq. Messer, Caparello & Self 215 S. Monroe Street, Suite 701 P.O. Box 1876 Tallahassee, FL 32302

3. ITC^DeltaCom is a small alternative local exchange company that provides local exchange service in the State of Florida. Whether and/or the extent to which rate centers should be consolidated will affect the substantial interests of ITC^DeltaCom and its business operations in the State of Florida.

DOCUMENT NUMBER-DATE 0 5091 MAY 10 8 FPSC-COMMISSION CLERK

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

Respectfully submitted this 10<sup>th</sup> day of May, 2002.

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Floyd Self, Esq. Tracy W. Hatch Messer, Caparello & Self 215 S. Monroe Street, Suite 701 P.O. Box 1876 Tallahassee, FL 32302 (850) 222-0720

and

Nanette S. Edwards, Esq. Director –Regulatory ITC^DeltaCom Communications, Inc. 4092 S. Memorial Parkway Huntsville, AL 35802 (256) 382-3856

Attorneys for ITC^DeltaCom Communications, Inc.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of ITC DeltaCom Communications, Inc.'s Petition to Intervene in Docket 010963-TP has been served on the following parties by Hand Delivery (\*) and/or U. S. Mail this 10th day of May, 2002.

Patricia Chirstensen, Esq.\* Division of Legal Services, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Nancy B. White, Esq. c/o Ms. Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

Jeffrey Whalen, Esq. Ausley Law Firm P.O. Box 391 Tallahassee, FL 32302

Michael A. Gross, Esq. Florida Cable Telecommunications Assoc., Inc. 246 E. 6<sup>th</sup> Avenue Tallahassee, FL 32301

Kenneth A. Hoffman, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302

Ms. Harriett Eudy ALLTEL Florida, Inc. P.O. Box 550 Live Oak, FL 32060

Mr. Tom Foley Eastern Region 820 Riverbend Blvd. Longwood, FL 32779

Ms. Deborah L. Nobles P.O. Box 485 Macclenney, FL 32063-0485

Ms. Lynn Hall Smart City Telecom P.O. Box 22555 Lake Buena Vista, FL 32830-2555

Ms. Carolyn Mason Mr. Winston Pierce State Technology Office Bureau of Policy and Regulation Services 4030 Esplanade Way, Suite 235 Tallahassee, FL 32399-0950 Ms. Michele Thomas VoiceStream Wireless 16 Wing Drive Cedar Knolls, NJ 07927

Tracy W. Hatch /