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(850) 425-2359

July 2, 2002

BY HAND DELIVERY

Blanca Bayó
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

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COMMISSION
CLERK

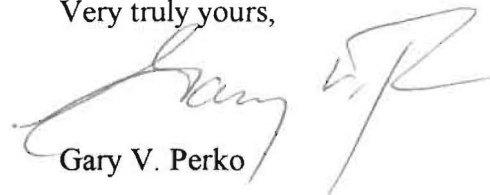
Re: Docket No. ⁰²⁰¹²⁹ 000121E

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom, Inc. and MCI Metro Access Communications, LLC are the original and fifteen copies of the Motion for Leave to File Direct Testimony and Exhibits Out of Time, Petition to Intervene of MCI WorldCom Communications, Inc. and MCI Metro Access Transmission Services, LLC and a redacted version of the direct testimony of Marc Argenbright. By copy of this letter copies have been furnished to the certificate of service list.

If you have any questions please feel free to call me at 425-2359.

Very truly yours,


Gary V. Perko

Redacted
Direct Testimony
of Marc Argenbright
DOCUMENT NUMBER DATE
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Enclosures

(Pet cc: Certificate of Service

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Interme)

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Petition to Intervene

DOCUMENT NUMBER DATE

06829 JUL -2 06829

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of US LEC of Florida)
Inc., Time Warner Telecom of Florida, LP)
and ITC^DeltaCom Communications)
objecting to and requesting suspension)
of proposed CCS7 Access Arrangement)
Tariff filed by BellSouth)
Telecommunications, Inc.)
_____)

Docket No. 02-0129-TP

Filed: July 2, 2002

**PETITION TO INTERVENE OF MCI WORLDCOM
COMMUNICATIONS, INC. AND MCIMETRO
ACCESS TRANSMISSION SERVICES, LLC**

MCI WorldCom Communications, Inc., and MCImetro Access Transmission Services, LLC (collectively "WorldCom") hereby files its petition to intervene in the above-captioned docket. As grounds therefor, WorldCom states:

- 1. WorldCom's full name and business address are:

MCI WorldCom Communications, Inc.
Concourse Corporate Center Six
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

- 2. All notices, pleadings and orders should be directed to the following representatives of WorldCom:

Richard D. Melson
Gary V. Perko
Hopping Green & Sams, P.A.
P.O. Box 6526
Tallahassee, FL 32314

Donna Canzano McNulty
WorldCom, Inc.
325 John Knox Road
The Atrium, Suite 105
Tallahassee, FL 32303

Brian Sulmonetti
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3. MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc., are certified by the Commission as alternative local exchange telecommunications company (ALECs). WorldCom purchases unbundled network elements from the incumbent local exchange companies in connection with WorldCom's provision of service to customers in Florida. Also, MCI WorldCom Communications, Inc., is certified by the Commission as interexchange telecommunications company (IXC).

4. In this docket, the Commission will address BellSouth's proposal to establish a new tariff that would apply to intrastate access related to SS7 service. Specifically, BellSouth proposes to add a per message Transacting Capability Application Part ("TCAP") charge of \$.000123, a per message Integrated Services Digital Network User Part ("ISUP") charge of \$.000035, in addition to the normal recurring switched access charges applicable to interexchange calls. The effect of this Proposed Tariff may be that every ILEC, ALEC, IXC and wireless carrier will raise rates to recover this new charge from either other carriers or from the consumer and will also restructure their access tariffs to charge BellSouth the SS7 message costs that each of these carriers also incur to complete calls. All carriers, not just BellSouth, incur costs to generate SS7 messages internally, transmit such messages to other carriers and to receive them from other carriers during the routing and completion of local and interexchange calls.

5. WorldCom is an ALEC that may be subject to the SS7 message charges reflected in the Proposed Tariff. WorldCom currently provides SS7 services to retail customers and other telecommunications companies. Accordingly, WorldCom's substantial rights and interests are affected by the Proposed Tariff and the decisions made by the Commission concerning the Proposed Tariff in this proceeding.

WHEREFORE, WorldCom petitions the Commission to grant it intervention and full party status in this docket.

RESPECTFULLY SUBMITTED this 28 day of July, 2002.

HOPPING GREEN & SAMS, P.A.

By: 

Richard D. Melson

Gary V. Perko

P.O. Box 6526

Tallahassee, FL 32314

and

DONNA CANZANO MCNULTY

WorldCom, Inc.

325 John Knox Road

The Atrium, Suite 105

Tallahassee, FL 32303

Attorneys for MCI WorldCom
Communications, Inc. and MCImetro
Access Transmission Service, LLP