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August 26, 2002

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
And Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 020868-TL Sprint's Motion to Dismiss and Opposition to the Petition
for Investigation, Sprint's Petition to Intervene and Request for Oral Argument

Dear Ms. Bayó:

Enclosed for filing is the original and fifteen (15) copies of Sprint's:

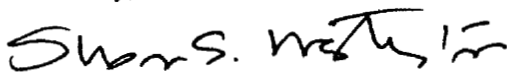
1. Motion to Dismiss and Opposition to the Petition for Investigation, ~~09012-02~~
2. Petition to Intervene 09013-02
3. Request for Oral Argument 09014-02

Copies of this have been served pursuant to the attached Certificate of Service.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


Susan S. Masterton

Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Investigation of Wireless)
Carriers' Request for BellSouth)
Telecommunications, Inc. to Provide)
Service Outside BellSouth's Exchange)

Docket No. 020868-TL

Filed: August 26, 2002

PETITION TO INTERVENE

Pursuant to Commission Rule 25-22.039, Sprint Corporation, on behalf of its wireless division, Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint") respectfully requests the Commission to allow Sprint to intervene in this proceeding. In support thereof Sprint states as follows:

1. Petitioners' name and address are:

Sprint Spectrum, L.P. d/b/a Sprint PCS
6200 Sprint Parkway
Overland Park, KS 66251

2. Sprint is a CMRS provider authorized by the Federal Communications Commission to provide wireless service in Florida and to enter into interconnection agreements for the exchange of traffic with incumbent local exchange companies pursuant to the federal Telecommunications Act of 1996 (the Act).
3. The instant proceeding involves a petition for investigation filed by BellSouth Telecommunications, Inc. (BellSouth). BellSouth has requested the Commission to determine BellSouth's obligations to load an NXX code assigned to Sprint PCS and whether the loading of such code is a violation of BellSouth's tariff. In accordance with FCC and NANP guidelines, Sprint PCS has selected a rating point for the NXX in Northeast Telephone's McClenny exchange and a routing point at BellSouth's tandem in the Jacksonville exchange.

DOCUMENT NUMBER DATE

09013 AUG 26 02

FPSC-COMMISSION CLERK

4. Any determination in this matter by the Commission will affect the substantial interests of Sprint. Sprint's substantial interests are affected because BellSouth is asking the Commission to make a decision that involves the arrangements by which Sprint must interconnect with BellSouth and third party carriers. Also, BellSouth is asking the Commission to make a decision that involves Sprint's ability to efficiently configure its network and provide cost-effective wireless services to its customers in Florida. The manner in which the decision BellSouth is asking the Commission to make affects Sprint's substantial interests is more fully set forth in Sprint's Motion to Dismiss and Opposition to Petition for Investigation, filed separately with the Commission on this same date.
5. No other party will adequately represent Sprint's rights and interests in this matter. To the contrary, BellSouth's interests in this matter are adverse to Sprint's interests.
6. All notices, pleadings, orders and documents in this proceeding should be provided to:

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Sprint
P.O. Box 2214
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(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@mail.sprint.com

AND

Monica M. Barone
Sprint
6391 Sprint Parkway, 2d Floor
Mail Stop: KSOPHT0101-Z2060
Overland Park, KS 66251
913-315-9134 (phone)
913-315-0785 (fax)

Wherefore, Sprint respectfully requests that the Commission grant this Petition and allow Sprint to become a full party of record in this docket.

Respectfully submitted this 26th day of August 2002.



Monica M. Barone
6391 Sprint Parkway
MailStop KSOPHT0101-Z2060
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