

LAW OFFICES
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October 16, 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. 020507-TL

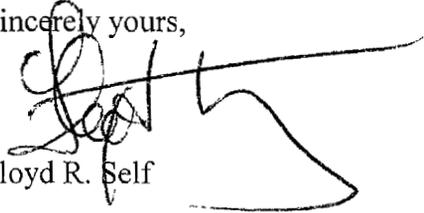
Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are an original and fifteen copies of ITC^DeltaCom's Petition to Intervene in the above referenced docket.

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.

Sincerely yours,


Floyd R. Self

FRS/amb

Enclosure

cc: Nanette Edwards, Esq.
Parties of Record

DOCUMENT NUMBER-DATE

11263 OCT 16 2002

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Florida Competitive Carriers)
Association Against BellSouth Telecommunications,)
Inc. Regarding BellSouth's practice of refusing)
to provide FastAccess Internet Service to customers)
who receive voice service from a competitive voice)
provider and request for expedited relief)
In re: Investigation into Telecommunications)
Rate Center Consolidation in the State of)
Florida)
_____)

Docket No. 020507-TL
Filed: October 16, 2002

PETITION TO INTERVENE

ITC^DELTA COM COMMUNICATIONS, INC., d/b/a ITC^DELTA COM ("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 4092 S. Memorial Parkway, Huntsville, Alabama, 35802. Pleadings, orders, notices and other papers filed or served in this matter should be served upon:

Nanette Edwards, Esq.
Director -Regulatory
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

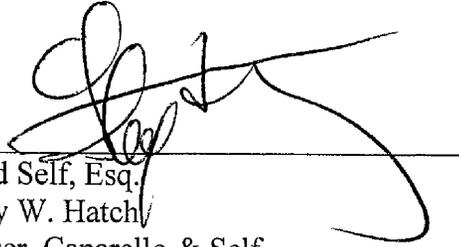
Floyd Self, Esq.
Messer, Caparello & Self
215 S. Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302

3. ITC^DeltaCom is a small alternative local exchange company ("ALEC") that provides local exchange service in the State of Florida. The issues raised by the Complaint in

this proceeding impact the ability of an ALEC, including ITC^DeltaCom, to compete for local exchange service customers. As such, the resolution of the issues in this docket will affect the substantial interests of ITC^DeltaCom and its business operations in the State of Florida.

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

Respectfully submitted this 16th day of October, 2002.



Floyd Self, Esq.
Tracy W. Hatch
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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

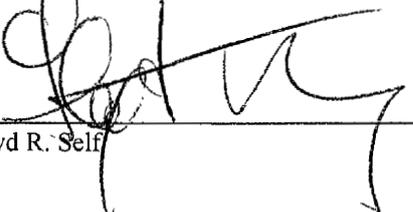
I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery and/or U.S. Mail this 16th day of October, 2002.

Patricia Christensen, Esq.*
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White
c/o Nancy H. Sims
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Tallahassee, FL 32301

Vicki Kaufman, Esq.
Joseph A. McGlothlin, Esq.
Florida Competitive Carriers Association
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Michael Gross, Esq.
Florida Cable Telecommunications Association, Inc.
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