



ORIGINAL

Florida Cable Telecommunications Association

Steve Wilkerson, President

**VIA HAND DELIVERY**

November 8, 2002

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

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**RE: Docket No. 021061-TP**

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Petition of Florida Cable Telecommunications Association for Leave to Intervene.

Copies of the Petition to Intervene have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

Michael A. Gross  
Vice President, Regulatory Affairs &  
Regulatory Counsel

Enclosure

cc: All Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of CNM Network )  
For Declaratory Statement )  
regarding Florida Public Service )  
Commission Jurisdiction )  
\_\_\_\_\_ )

Docket No. 021061-TP

Filed: November 8, 2002

**PETITION OF FLORIDA CABLE TELECOMMUNICATIONS**  
**ASSOCIATION FOR LEAVE TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in this docket, and states:


1. The FCTA is a non-profit trade association representing the cable telecommunications industry in Florida, including cable companies providing cable services and information services in the State of Florida, as well as certificated alternative local exchange carriers ("ALECs") providing local exchange telecommunications service in Florida ("FCTA Members"). The FCTA's business address is 246 E. 6<sup>th</sup> Avenue, Tallahassee, FL 32303.
2. The name and address of the person authorized to receive all notices, pleadings and other communications in this docket is:

Michael A. Gross  
Vice President, Regulatory Affairs and Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676  
E-mail: mgross@fcta.com

3. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of FCTA Members and their business operations in the State of Florida.
4. The rights and interests of FCTA's Members cannot be adequately represented by any other party in this docket. The FCTA's participation in this docket will not unduly delay or prejudice the rights of other parties.
5. The FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple FCTA Members.
6. The FCTA reserves the right to participate with full party status on matters affecting FCTA Members.

WHEREFORE, for the foregoing reasons, the FCTA requests that the Commission grant its Petition for Intervention, and afford the FCTA full party status in this proceeding, and requests that the Commission establish a procedural schedule in this docket that allows FCTA and other substantially affected parties to submit motions and legal memoranda to be considered in Commission's deliberation on the Petition.

Respectfully submitted this 8<sup>th</sup> day of November, 2002.

  
\_\_\_\_\_  
Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue  
Tallahassee, FL 32303  
Tel: 850/681-1990  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition of Florida Cable Telecommunications Association for Leave to Intervene in Docket 021061-TP has been served upon the following parties by U.S. Mail this 8<sup>th</sup> day of November 2002:

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\_\_\_\_\_  
Michael A. Gross