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January 17, 2003

ORIGINAL

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

> Docket Nos. 981834-TP and 990321-TP Re:

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are an original and fifteen copies of ITC^DeltaCom Communications, Inc.'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

Tracy W. Hatch

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CMP COM

CTR ECR GCL

OPC MMS SEC

> TWH/amb Enclosure

Nanette Edwards, Esq. cc:

Parties of Record

RECEIVED & FILED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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:

- 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 parties 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 17th day of January, 2003.

Floyd Self, Esq.

Tracy W. Hatch Messer, Caparello & Self

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and

Nanette S. Edwards, Esq.

Director – Regulatory

ITC^DeltaCom Communications, Inc.

4092 S. Memorial Parkway

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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 17th day of January, 2003.

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