Richard Chapkis Vice President & General Counsel, Southeast Region Legal Department



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July 10, 2003

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

Re:

Docket No. 030413-TP

Petition for declaratory statement that ALLTEL Communications, Inc., commercial mobile radio service provider in Florida, is not subject to the jurisdiction of the Florida Public Service Commission for purposes of designation as "eligible telecommunications carrier"

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s Petition to Intervene in the above matter. Also enclosed for filing are an original and 15 copies of a Request for Representation by Qualified Representative. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-1256.

Sincerely, Inchard A. Chaplan RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Richard Chapkis

RC:tas **Enclosures** 

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for declaratory statement that	)	Docket No. 030413-TP
ALLTEL Communications, Inc., commercial	)	Filed: July 10, 2003
mobile radio service provider in Florida, is not	<b>)</b>	·
subject to the jurisdiction of the Florida Public	)	
Service Commission for purposes of designation	)	
as "eligible telecommunications carrier"	)	
_	_ )	

## **VERIZON FLORIDA INC.'S PETITION TO INTERVENE**

Under Commission Rule 25-22.039, Verizon Florida Inc. (Verizon) petitions the Commission to allow Verizon to intervene in this proceeding. Verizon is a telecommunications company as that term is defined in Section 364.02 of the Florida Statutes. As such, its regulated intrastate operations are subject to the jurisdiction of this Commission.

Communications in regard to this proceeding should be directed to:

Richard Chapkis Verizon Florida Inc. P. O. Box 110, FLTC0717 Tampa, FL 33601-0110 Telephone: (813) 483-1256

Facsimile: (813) 273-9825

email: richard.chapkis@verizon.com

Any decisions made by the Commission in this case will necessarily affect Verizon's substantial interests and business operations in the state of Florida.

WHEREFORE, Verizon requests that the Commission allow it to intervene in this matter. Respectfully submitted on July 10, 2003.

By:

Richard Chapkis

Post Office Box 110, FLTC0717

Tampa, Florida 33601 Telephone: 813-483-1256

Attorney for Verizon Florida Inc.

DOCUMENT ALMORE DATE

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Petition to Intervene and Request for Representation by Qualified Representative in Docket No. 030413-TP were sent via U.S. mail on July 10, 2003 to the parties on the attached list.

Puchard A Chapter
Richard Chapkis

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 BellSouth Telecommunications Nancy B. White c/o Nancy Sims 150 S. Monroe St., Suite 400 Tallahassee, FL 32301-1556 ALLTEL Communications Bettye J. Willis One Allied Drive, B4F04-ND Little Rock, AR 72203-2177

ALLTEL Communications Stephen B. Rowell One Allied Drive, B5F11 Little Rock, AR 72203-2177 David B. Erwin 127 Riversink Road Crawfordville, FL 32327 GT Com R. Mark Ellmer P. O. Box 220 Port St. Joe, FL 32457-0220

Florida Cable Telecomm. Assn. Michael A. Gross 246 E. 6<sup>th</sup> Avenue, Suite 100 Tallahassee, FL 32303

Northeast Florida Telephone Deborah Nobles 505 Plaza Circle, Suite 200 Orange Park, FL 32073 Radey Thomas Yon & Clark Susan Clark 101 N. Monroe Street Suite 775 Tallahassee, FL 32301

TDS Telecom/Quincy Telephone Thomas McCabe 107 W. Franklin Street Quincy, FL 32353