

LAW OFFICES
Messer, Caparello & Self
A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

ORIGINAL

September 30, 2003

SEP 30 PM 3:28
COMMISSION
CLERK

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 030851-TP

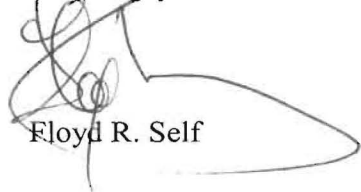
Dear Ms. Bayó:

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 these documents 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

AUS _____
CAF _____
CMP _____
COM 5 _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC 1 _____
OTH Hong _____

Done 10/03/03

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE
09379 SEP 30 8
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission's) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching) Filed: September 30, 2003
for Mass Market Customers)
_____)

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

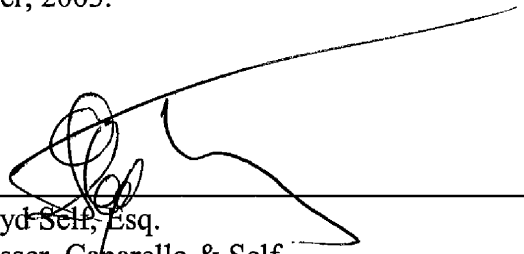
Floyd Self, Esq.
fself@lawfla.com
Messer, Caparello & Self
Hand: 215 S. Monroe Street, Suite 701
Tallahassee, FL 32301
Mail: P.O. Box 1876
Tallahassee, FL 32302-1876

3. ITC^DeltaCom is a competitive local exchange company ("CLEC") that provides local exchange service in the State of Florida. The scope of this docket and the ultimate resolution of the issues set forth by the FCC for consideration in this proceeding will have a direct and

immediate impact on the ability of a CLEC, 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 30th September, 2003.



Floyd Self, Esq.
Messer, Caparello & Self
215 S. Monroe Street, Suite 701
Tallahassee, FL 32302
(850) 222-0720

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 U. S. Mail this 30th day of September, 2003.

Jason Rojas, Esq.*
Office of General Counsel, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Charles J. Rehwinkel
Sprint-Florida, Incorporated
MC FLTHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

Kimberly Caswell
Verizon Select Services
FLTC-0007
8800 Adamo Drive
Tampa, FL 33619

Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Mr. James White
ALLTEL
601 Riverside Avenue
Jacksonville FL 32204-2987

Ms. Laurie A. Maffett
Frontier Telephone Group
180 South Clinton Avenue
Rochester NY 14646-0700

Mr. R. Mark Ellmer
GT Com
P. O. Box 220
Port St. Joe FL 32457-0220

Mr. Robert M. Post, Jr.
ITS Telecommunications Systems, Inc.
P. O. Box 277
Indiantown FL 34956-0277

Ms. Harriet Eudy
NEFCOM
11791 110th Street
Live Oak FL 32060-6703

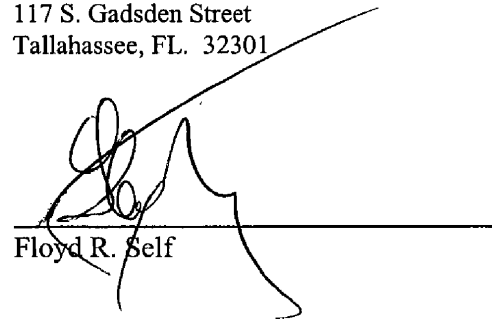
Ms. Lynn B. Hall
Smart City Telecom
P. O. Box 22555
Lake Buena Vista FL 32830-2555

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue
Tallahassee, FL 32301

Tracy W. Hatch, Esq.
AT&T Communications of the Southern States, LLC
101 N. Monroe Street, Suite 701
Tallahassee, FL 32301

Donna McNulty, Esq.
WorldCom
1203 Governors Square Blvd, Suite 201
Tallahassee, FL 32301-2960

Vicki Kaufman, Esq.
Joe McGlothlin, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 S. Gadsden Street
Tallahassee, FL. 32301


Floyd R. Self