

LAW OFFICES

Messer, Caparello & Self

A Professional Association

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

September 30, 2003



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. 030852-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

AUS

CMP

COM

MMS

cc: Nanette Edwards, Esq.

Parties of Record

RECEIVED & FILED

EDEC BUREAU OF RECORDS

DOWNTOWN OFFICE, 215 South Monroe Street, Suite 701 · Tallahassee, Fl 32301 · Phone (850) 222-0720 · Fax (850) 224-4359 NORTHEAST OFFICE, 3116 Capital Circle, NE, Suite 5 · Tallahassee, Fl 32308 · Phone (850) 668-5246 · Fax (850) 668-5613

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)	
and Dark Fiber Transport)	
and Route-Specific Review for DS1, DS3)	
Review for DS1, DS3, and Dark Fiber Loops,)	Filed: September 30, 2003
triennial UNE review: Location-Specific)	Docket No. 030852-TP
from Federal Communications Commission's)	
In re: Implementation of requirements arising)	

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:

- 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