BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising From Federal Communications Commission's Triennial UNE review; Location-Specific Review for DS1, DS3 and Dark Fiber Loops, And Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

Docket No. 030852-TP

Filed: October 2, 2003

THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S PETITION TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Competitive Carriers Association (FCCA), through its undersigned counsel, submits its Petition to Intervene and states:

1. Copies of all pleadings, notices, and orders in this Docket should be provided to:

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2. The FCCA is a Florida not-for-profit corporation, whose members provide competitive telecommunications services in the state. In this docket, the Commission will address the requirements of the Federal Communications Commission's (FCC) *Triennial Review Order (TRO)*. The members of the FCCA are a group of companies whose interests will be substantially affected by this Commission's interpretation of the FCC's *TRO*. Thus, the FCCA has standing to intervene in this proceeding.

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- 3. Ultimate facts alleged include, but are not limited to, the fact the FCC's *TRO* must be interpreted and applied to facilitate local competition.
- 4. Any determinations and actions in this docket regarding the *TRO* will affect the substantial interests of FCCA members as CLECs operating in Florida. Granting the FCCA leave to intervene in this docket will provide the Commission with greater insight into the correct interpretation and application of the *TRO*. The FCCA has standing under Chapter 120, Florida Statutes, and applicable rules to be granted intervention in this proceeding.

WHEREFORE, the Florida Competitive Carriers Association requests the Commission to enter an Order authorizing it to intervene as a full party to this proceeding.

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Attorneys for Florida Competitive Carriers Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Competitive Carriers Association's Petition to Intervene has been provided by (*) hand delivery or U.S. Mail this 2nd day of October 2003, to the following:

(*) Beth Keating Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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