MOYLE, FLANIGAN, KATZ, RAYMOND & SHEEHAN, P.A.

ATTORNEYS AT LAW

The Perkins House 118 North Gadsden Street Tallahassee, Florida 32301

ORIGINAL

Telephone: (850) 681-3828

Facsimile: (850) 681-8788

JON C. MOYLE, JR.

E-mail: jmoylejr@moylelaw.com

October 17, 2003

Wellington Office (561) 227-1560 West Palm Beach Office (561) 659-7500

COMMISSION

By Hand Delivery

Ms. Blanca Bayo'
Division of Records & Reporting
Florida Public Service Commission
Room 110, Easley Building
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 030851-TP and Docket No. 030852-TP

Dear Ms. Bayo':

Enclosed for filing on behalf of NewSouth Communications Corp. ("NewSouth") are an original and fifteen copies each of NewSouth's Petitions to Intervene in the above-referenced dockets. Please acknowledge receipt of these filings by stamping the extra copy of each Petition COM as "filed."

If you have any questions or need additional information, please let me know.

Sincerely,

Jon C. Moyle, J

JCMJ/jd Enclosures

ECR

GCL OPC MMS

SEC OTH

cc: Parties of Record

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

STE ID HOLDSTOWN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket No. 030851-TP

Filed October 17, 2003

PETITION TO INTERVENE

NEWSOUTH COMMUNICATIONS CORP. ("NewSouth"), 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. NewSouth 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. NewSouth's principal place of business is NewSouth Center, Two N. Main Center, Greenville, South Carolina 29601.
- 3. Pleadings, orders, notices and other papers filed or served in this matter should be served upon:

Jake E. Jennings
Senior Vice-President
Regulatory Affairs & Carrier Relations
NewSouth Communications Corp.
NewSouth Center
Two N. Main Center
Greenville, South Carolina 29601

Jon C. Moyle, Jr., Esquire Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

4. NewSouth 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

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issues set forth by the FCC to consideration in this proceeding will have a direct and immediate impact on the ability of a CLEC, including NewSouth, to compete for local exchange service customers. As such, the resolution of the issues in this docket will affect the substantial interests of NewSouth and its business operations in the State of Florida.

WHEREFORE, NewSouth Communications Corp. respectfully requests that the Commission grant the Company leave to intervene for all legal purposes in this docket.

Respectfully submitted,

Jake E. Jennings

Senior Vice President

Regulatory Affairs & Carrier Relations

NewSouth Communications Corp.

NewSouth Center

Two N. Main Center

Greenville, SC 29601

Telephone: (864) 672-5877

Facsimile: (864) 672-5313

JON C. MOYLE, JR.

Florida Bar No. 0727016

Moyle Flanigan, Katz, Raymond & Sheehan, P.A.

118 North Gadsden Street

Tallahassee, Florida 32301

Telephone: (850) 681-3828

Facsimile: (850) 681-8788

Attorneys for NewSouth Communications Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of October, 2003, a true and correct copy of the

foregoing has been furnished by hand delivery* or by U.S. Mail to the following:

*Jason Rojas
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

Susan S. Masterton
Sprint-Florida, Incorporated
Sprint Communications Company
Limited Partnership
Post Office Box 2214
Tallahassee, FL 32316-2214

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

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

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

R. Mark Ellmer GT Com Post Office Box 220 Port St. Joe, FL 32457-0220

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

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

Lynn B. Hall Smart City Telecom Post Office Box 22555 Lake Buena Vista, FL 32830-2555

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

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

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

De O'Roark MCI WorldCom Communications, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328

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

Marva Brown Johnson KMC Telecom III, LLC 1755 North Brown Road Lawrenceville, GA 30034-8119

Floyd Self Messer, Caparello & Self Post Office Box 1876 Tallahassee, FL 32302

Jon C. Moyle, Jr.