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October 31, 2003

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BY HAND DELIVERY

Ms. Blanco Bayo  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

RECEIVED FPSC  
03 OCT 31 PM 4:35  
COMMISSION  
CLERK

Re: Docket Nos. 030867-TL, 030868-TL, 030869-TL

Dear Ms. Bayo:

Enclosed for filing on behalf of Knology of Florida, Inc. are an original and fifteen copies of Knology's Petition to Intervene and Testimony of Felix L. Boccucci, Jr. on behalf of Knology.

Thank you for your assistance.

RECEIVED & FILED  
in  
FPSC-BUREAU OF RECORDS

Sincerely,

*George N. Meros, Jr.*  
George N. Meros, Jr.

GNM/kj  
Enclosures

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM 5+ original  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
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MMS \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH \_\_\_\_\_

cc: Parties of Record

Petition  
DOCUMENT NUMBER-DATE  
10862 OCT 31 8

Testimony  
DOCUMENT NUMBER-DATE  
10863 OCT 31 8

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by  
\*hand delivery and U.S. mail this 31<sup>st</sup> day of October, 2003 on the following:

\*Felicia Banks  
Office of General Counsel, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Nancy White  
c/o Ms. Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

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Tallahassee, FL 32302

Susan S. Masterson  
Sprint-Florida, Incorporated  
Sprint Communications Company  
P.O. Box 2214  
Tallahassee, FL 32316-2214

Michael A. Gross  
Florida Cable Telecommunications Assoc., Inc.  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Tracy Hatch  
AT&T  
101 N. Monroe Street, Suite 700  
Tallahassee, FL 32301

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

Mark Cooper  
AARP  
504 Highgate Terrace  
Silver Spring, MD 20904

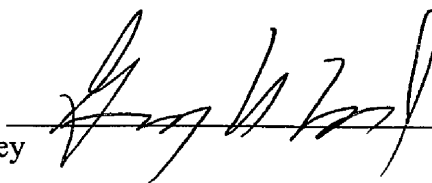
Michael Twomey  
P.O. Box 5256  
Tallahassee, FL 32314-5256

Charles Beck  
Office of Public Counsel  
111 W. Madison Street, #812  
Tallahassee, FL 32399-1400

The Honorable Charles Crist  
Attorney General of Florida  
PL 01, The Capitol  
Tallahassee, FL 32399-1050

Floyd Self  
Messer, Caparello & Self, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Attorney



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Verizon Florida Inc. to ) DOCKET NO. 030867-TL  
reform intrastate network access and basic )  
local telecommunications rates in )  
accordance with Section 364.164, Florida )  
Statutes )

In re: Petition by Sprint-Florida, ) DOCKET NO. 030868-TL  
Incorporated to reduce intrastate switched )  
network access rates to interstate parity in )  
revenue-neutral manner pursuant to Section )  
364.164(1), Florida Statutes. )

In re: Petition for implementation of ) DOCKET NO. 030869-TL  
section 364.164, Florida Statutes, by )  
rebalancing rates in a revenue-neutral ) Filed: October 31, 2003  
manner through decreases in intrastate )  
switched access charges with offsetting rate )  
adjustments for basic services, by )  
BellSouth Telecommunications, Inc. )

**KNOLOGY OF FLORIDA, INC. PETITION TO INTERVENE**

Knology of Florida, Inc., ("Knology"), pursuant to Sections 120.569 and 120.57(1), Florida Statutes and Rules 25-22.039, and 28-106.205, Florida Administrative Code, hereby requests leave to intervene in these proceedings, and as grounds therefore states:

1. Knology 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. Knology's principal place of business is 1241 O.G. Skinner Drive, West Point, Georgia 31833.

DOCUMENT NUMBER DATE

10862 OCT 31 8

FPSC-COMMISSION OFFICE

3. Pleadings, orders, notices and other papers filed or served in this matter should be served by hand delivery or fax upon:

George Meros  
Gray, Harris, & Robinson, P.A.  
301 S. Bronough St., Suite 600  
Tallahassee, FL 32301  
Mail: P.O. Box 11189  
Tallahassee, FL 32302-3189  
Telephone: (850) 577-9090  
Facsimile: (850) 577-3311  
Email: GMeros@grayharris.com

and

John Feehan  
Knology, Inc.  
1241 O.G. Skinner Drive  
West Point, Georgia 31833  
Telephone: (706) 634-2828  
Facsimile: (706) 645-0148  
Email: john.feehan@knology.com

4. Knology is a certified competitive local exchange carrier (“CLEC”) that provides local and long distance telephone services, digital and analog cable services and high speed data services to Florida consumers. The scope of this docket and the ultimate resolution of the issues set forth for consideration in this proceeding will have a direct, immediate and substantial impact on the Company’s future decisions to expand operations in Florida.

5. Knology currently serves the residents of Panama City, Panama City Beach and Lynn Haven communities as a competitive service provider for voice, video and data services.

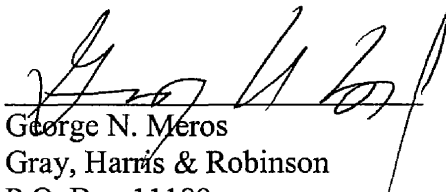
6. Knology, Inc., Knology of Florida, Inc.'s parent company, recently announced an agreement to purchase the cable and data assets of Verizon Florida (Verizon New Media Ventures) in Pinellas County, Florida.

7. The Tele-Competition Act and its implementation that is the subject of these proceedings directly influenced Knology's decision to expand operations in Florida.

8. The granting of these petitions will enhance Knology's ability to provide competitive alternatives to Florida's citizens. Knology requests that the Commission grant it full intervenor status in these consolidated dockets in order to provide testimony supporting these petitions.

WHEREFORE, Knology of Florida, Inc. respectfully requests that the Commission grant the Company leave to intervene for all legal purposes in this docket.

Respectfully submitted this 31<sup>st</sup> day of October, 2003.

  
George N. Meros  
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and

John Feehan  
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1241 O.G. Skinner Drive  
West Point, Georgia 31833  
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Facsimile: (706) 645-0148  
Email: [john.feehan@knology.com](mailto:john.feehan@knology.com)

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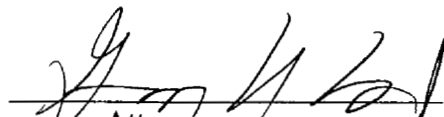
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Attorney General of Florida  
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Attorney