

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of:

Petition by Verizon Florida, Inc. to Reform  
Intrastate Network Access and Basic Local  
Telecommunications Rates in Accordance  
with Section 364.164, Florida Statutes.

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Docket No. 030867 - TL

Petition by Sprint-Florida, Incorporated to  
Reduce Intrastate Switched Network Access  
Rates to Interstate Parity in Revenue - Neutral  
Manner Pursuant to Section 364.164(1),  
Florida Statutes.

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Docket No. 030868 - TL

Petition for Implementation of Section 364.164,  
Florida Statutes, by Rebalancing Rates in a  
Revenue - Neutral Manner Through Decreases  
In Intrastate Switched Access Charges With  
Offsetting Rate Adjustments for Basic Services,  
By BellSouth Telecommunications, Inc.

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Docket No. 030869 - TL

**PETITION OF CHARLES J. CRIST, JR.,  
ATTORNEY GENERAL, STATE OF FLORIDA, TO INTERVENE**

CHARLES J. CRIST, JR., Attorney General, State of Florida (Attorney General), pursuant to Rule 25-22.039, Florida Administrative Code, petitions the Florida Public Service Commission (Commission) to enter an order granting leave to the Attorney General to intervene in this Docket and states:

1. The Attorney General, pursuant to Art. IV, Section 4, Fla. Const., is the chief legal officer of the State with his principal place of business and mailing address at:

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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2. The Attorney General brings this Petition in his *parens patriae* capacity as guardian of the health, welfare, and safety of the citizens of the State of Florida.

3. The Attorney General has broad statutory authority to prosecute and appear in suits in which the State is a party or is otherwise interested. Section 16.01(4), (5), and (6), Florida Statutes. One of the matters in which the State has an interest is upholding the intent and public purpose of legislative enactments.

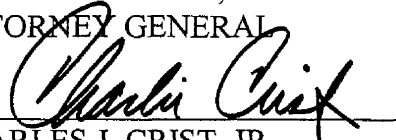
4. Where the public interest is involved, the Attorney General may not only initiate litigation, but also intervene in pending litigation. State ex rel. Shevin v. Yarbrough, 257 So. 2d 891, 894 (Fla. 1972). The Attorney General is granted wide discretion in determining what particular matters involve the public interest. State ex rel. Shevin v. Exxon Corp., 526 F. 2d 266, 268-69 (5<sup>th</sup> Cir. 1976). Accordingly, his conclusion that a particular matter involves the public interest is presumed to be correct. Yarbrough, at 895.

5. The enforcement of the statutes, rules, and policies at issue in this proceeding clearly involves matters of public interest.

WHEREFORE, the Attorney General respectfully requests that the Commission enter an order allowing the Attorney General to intervene in this Docket.

DATED this 17<sup>th</sup> day of November, 2003.

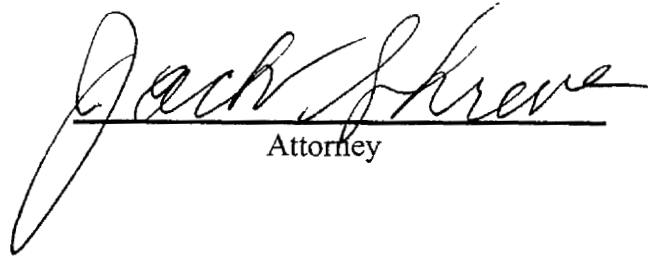
Respectfully submitted,  
CHARLES J. CRIST, JR.  
ATTORNEY GENERAL



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STATEMENT OF COMPLIANCE WITH RULE 28-106.204(3)

Pursuant to Rule 28-106.204(3), Fla. Admin. Code, the Movant has conferred with the other parties of record. As of the time of this filing, the Office of Public Counsel, BellSouth and Michael B. Twomey have no objection to this Petition. Verizon and Sprint were unable to provide a response at this time.

  
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Attorney

**CERTIFICATE OF SERVICE**  
**DOCKETS NOS. 030867-TL, 030868-TL, 030689-TL**

I CERTIFY that a true and correct copy hereof has been furnished by United States mail to the following on this 17<sup>th</sup> day of November, 2003.

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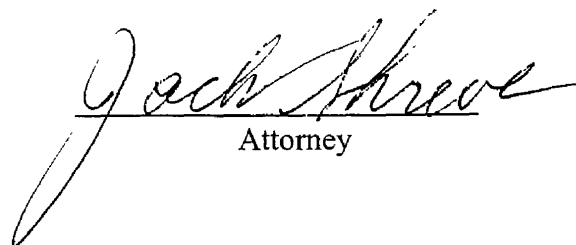
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