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# Messer, Caparello & Self

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April 26, 2004

## BY HAND DELIVERY

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 040156-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCImetro Access Transmission Services, LLC, MCI WORLDCOM Communications, Inc., Metropolitan Fiber Systems of Florida, Inc., and Intermedia Communications, Inc. (collectively "MCI") are an original and fifteen copies of MCI'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,

yd R. Self

FRS/amb Enclosures

cc: Parties of Record

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In Re: Petition for Arbitration of Amendment to | ) |                       |
|---|---|-----------------------|
| Interconnection Agreements with Certain         | ) | Docket No. 040156     |
| Competitive Local Exchange Carriers and         | ) |                       |
| Commercial Mobile Radio Service Providers in    | ) | Filed: April 26, 2004 |
| Florida by Verizon Florida Inc.                 | ) | •                     |
|   | ) |                       |

### MCI'S PETITION TO INTERVENE

MCImetro Access Transmission Services, LLC, MCI WORLDCOM

Communications, Inc., Metropolitan Fiber Systems of Florida, Inc., and Intermedia

Communications Inc. (collectively "MCI"), pursuant to Rules 25-22.039 and 28-106-205,

Florida Administrative Code, hereby request leave to intervene in this proceeding, and as grounds therefore states:

- 1. Each of the MCI operating subsidiaries mentioned above are 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.
- MCI's principal place of business is 22001 Loudoun County Parkway,
   Ashburn, Virginia 20147.
- 3. Pleadings, orders, notices, and other papers filed or served in this matter should be served upon:

Donna Canzano McNulty, Esq.

MCI

1203 Governors Square Blvd, Suite 201

Tallahassee, FL 32301

donna.mcnulty@mci.com

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MCI

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and

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Hand: 215 S. Monroe Street, Suite 701

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4. Each of the MCI operating subsidiaries mentioned above is authorized by the Florida Public Service Commission to provide local telecommunications services in the State of Florida. Because this proceeding will address Verizon's request for arbitration of amendments to interconnection agreements with competitive local exchange carriers, the Commission's decision in this docket will directly affect the substantial interests of MCI and its business operations in the State of Florida.

WHEREFORE, MCImetro Access Transmission Services, LLC, MCI
WORLDCOM Communications, Inc., Metropolitan Fiber Systems of Florida, Inc., and
Intermedia Communications Inc. respectfully request that the Commission grant them the
leave to intervene for all legal purposes in this docket.

Respectfully submitted this 26<sup>th</sup> day of April, 2004.

Donna Canzano McNulty, Esq.

MCI

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and

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Attorneys for MCImetro Access Transmission Services, LLC, MCI WORLDCOM Communications, Inc., Metropolitan Fiber Systems of Florida, Inc., and Intermedia 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 Hand Delivery (\*) and/or U.S. Mail on this 26<sup>th</sup> day of April, 2004.

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Mr. Michael E. Britt LecStar Telecom, Inc. 4501 Circle 75 Parkway, Suite D-4200 Atlanta, GA 30339-3025

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