

**ORIGINAL**

**Matilda Sanders**

**From:** Charlene Roberts [CRoberts@gray-robinson.com]  
**Sent:** Wednesday, December 22, 2004 12:13 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** George Meros; Karen Jusevitch  
**Subject:** for filing Petition to Intervene of Knology of Florida

See attached PDF of Petition to Intervene (4 pages total) to be filed in the existing matter of:

Complaint against Verizon Florida, Inc.  
and request for declaratory ruling by  
Bright House Networks Information  
Services, LLC (Florida)

Docket No. 041170

Attorney filing Petition to Intervene on behalf of Knology of Florida

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Charlene Roberts

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FPSC-COMMISSION CLEAR

Complaint against Verizon Florida, Inc.	)	Docket No. 041170
and request for declaratory ruling by	)	
Bright House Networks Information	)	Filed: October 11, 2004
Services, LLC (Florida)	)	

**PETITION TO INTERVENE OF KNOLOGY OF FLORIDA**

COMES NOW Knology of Florida, Inc., ("Knology") and, pursuant to Rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission ("Commission") in the above-referenced docket. Knology respectfully requests that the Commission grant this petition, designating Knology as a party of record and affording it all applicable rights under Florida law and the rules and regulations of this Commission. In support thereof, Knology respectfully shows as follows:

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. Petitioner's principal place of business is:

Knology of Florida, Inc.  
1241 O.G. Skinner Drive  
West Point, Georgia 31833

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

George Meros  
GrayRobinson, P.A.  
301 S. Bronough St., Suite 600  
Tallahassee, FL 32301  
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and

Felix L. Boccucci, Jr.  
**Knology, Inc.**  
1241 O.G. Skinner Drive  
West Point, Georgia 31833  
Telephone: (706) 634-2828  
Facsimile: (706) 645-0148  
E-mail: felix.boccucci@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. As such, Knology is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact Knology's ability to provide local exchange telecommunications service.

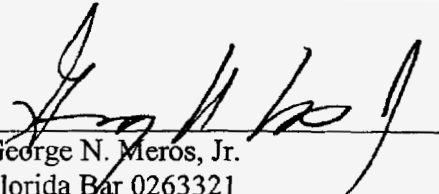
5. Knology currently serves the residents of Panama City, Panama City Beach, Lynn Haven, Cedar Grove, Callaway, Parker and portions of Pinellas County as a competitive service provider for voice, video and data services.

6. Knology provides local telephone service in Florida through traditional circuit switch using its state-of-the-art broadband networks. Knology's product, like the local telephone service provided by Bright House Networks Information Services, LLC, ("Bright House") described in its Complaint and Petition for Declaratory Ruling, requires the use of local telephone numbers. When a voice customer chooses the local telephone services offered by Knology, that customer may wish to retain his current telephone number. Any delay or failure in the porting of local telephone numbers for customers subscribing to Knology's local telephone service will adversely affect Knology's ability to offer its phone service. Accordingly, Knology's substantial interests will be affected by any action that the Commission takes in this docket to address the issues raised by Bright House in its Complaint and Petition for Declaratory Ruling.

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

Respectfully submitted this 22<sup>nd</sup> day of December, 2004.

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*Attorneys for Knology, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Petition of Intervention  
was served by U.S. mail this *22<sup>nd</sup>* day of December, 2004 on the following:

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Tallahassee, FL 32399-0850

David Christian  
Verizon Florida, Inc.  
106 E. College Avenue  
Tallahassee, FL 32301-7748

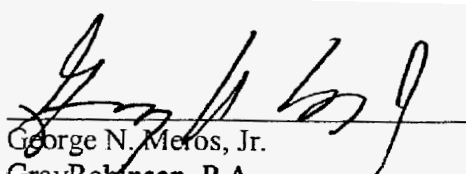
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