

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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
Mail: P.O. Box 11189
Tallahassee, FL 32302-3189
Telephone: (850) 577-9090
Facsimile: (850) 577-3311
E-mail: GMeros@gray-robinson.com

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.

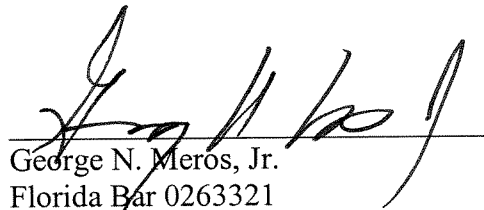
5. Knology currently serves the residents of Panama City, Panama City Beach, Lynn Haven, Cedar Grove, Callaway, Parker and portions of Pinellas County as a competitive service provider for voice, video and data services.

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 22nd 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 22nd day of December, 2004 on the following:

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2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

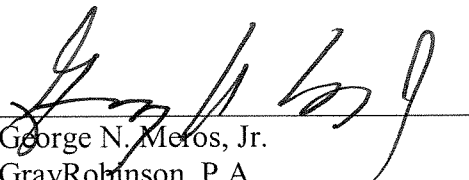
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