

**ORIGINAL**

**Matilda Sanders**

**From:** Daniels, Sonia C - LGCRP [soniadaniels@att.com]  
**Sent:** Monday, February 21, 2005 9:41 AM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket 041269-TP AT&T Petition to Intervene  
**Attachments:** 041269- ATT Pet to Intervene 2-21-05.pdf

Re: Docket 041269--Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc.

Attached please find for electronic filing AT&T's Petition to Intervene in the above-referenced docket. The cover letter, certificate of service and Petition are a total of 4 pages. The attached document should be considered the official version for purposes of the docket file.

As indicated in the Certificate of Service, copies the Petition are being distributed to parties U.S. Mail. Thank you for your assistance in this matter.

<<041269-ATT Pet to Intervene 2-21-05.pdf>>

*Sonia Daniels*  
Docket Manager  
AT&T Law & Gov't Affairs  
1230 Peachtree  
4th Floor  
Atlanta, GA 30309  
Phone: 404-810-8488  
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- CMP \_\_\_\_\_
- COM \_\_\_\_\_
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2/21/2005

DOCUMENT NUMBER-DATE

01746 FEB 21 05

FDSC-COMMISSION CLERK

ORIGINAL



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**Tracy Hatch**  
Senior Attorney  
Law and Government Affairs  
Southern Region

Suite 700  
101 N. Monroe Street  
Tallahassee, FL 32301  
850-425-6360

February 21, 2005

**BY ELECTRONIC FILING**

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

Re: Docket No. 041269-TP

Dear Ms. Bayó:

Attached for filing in the above-referenced docket please find the Petition to Intervene on behalf of AT&T Communications of the Southern States, LLC. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

*s/ Tracy W. Hatch*

Tracy W. Hatch

TWH/scd  
Attachment  
cc: Parties of Record

DOCUMENT NUMBER-DATE

01746 FEB 21 05

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition to establish generic docket to )  
consider amendments to Interconnection )  
agreements resulting from changes in )  
law, by BellSouth Telecommunications, Inc.)

Docket No. 041269-TP  
Filed: February 21, 2005

PETITION TO INTERVENE

COMES NOW AT&T Communications of the Southern States, LLC (hereinafter "AT&T") and, pursuant to Rule 25-22.039, Florida Administrative Code, files this Petition to Intervene with the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. AT&T respectfully requests that the Commission grant this petition, designating AT&T 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, AT&T respectfully shows as follows:

1. Petitioner's principal place of business is:

AT&T  
1230 Peachtree Street, N.E.  
4<sup>th</sup> Floor  
Atlanta, Georgia 30309

2. All pleadings, orders, notices and other correspondence with respect to this docket should be addressed to:

Tracy W. Hatch  
Senior Attorney  
AT&T  
101 N. Monroe Street  
Suite 700  
Tallahassee, FL 32301  
(850) 425-6360

Sonia Daniels  
Docket Manager  
1230 Peachtree Street, NE  
4<sup>th</sup> Floor  
Atlanta, GA 30309  
(404) 810-8488

3. AT&T is a telecommunications company that has been duly certificated by the Commission as a competitive local exchange telecommunications company ("CLEC") and an interexchange company ("IXC") in Florida. As such, AT&T is subject to the rules, regulations and orders of the Commission, and such rules, regulations and orders impact AT&T's ability to provide local exchange telecommunications service and intrastate interexchange telecommunications service.

4. AT&T has an existing Commission approved interconnection agreement with BellSouth Telecommunications Inc and has substantial interest which will be subject to determination or will be affected by resolution of issues in this proceeding.

5. Disputed issues of fact may include, but are not limited to, the interpretation and application of the FCC's *Triennial Review Remand Order*.

6. Ultimate facts alleged include, but are not limited to, the fact the FCC's *Triennial Review Remand Order* must be interpreted and applied to facilitate local competition.

WHEREFORE, AT&T requests that it be permitted to intervene in this proceeding and that it be accorded full party status.

/s/ Tracy W. Hatch

Tracy W. Hatch  
Senior Attorney  
AT&T  
101 N. Monroe Street  
Suite 700  
Tallahassee, FL 32301  
(850) 425-6360

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of AT&T's Petition for Intervention was served by electronic and U.S. Mail this 21st day of February 2005 to the following:

Adam Teitzman  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
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