

ORIGINAL

Timolyn Henry

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]
Sent: Thursday, February 24, 2005 1:05 PM
To: Filings@psc.state.fl.us
Subject: 041482-TP/041447-TP Petition to Intervene
Importance: High
Attachments: 041282-T.pdf

A. Vicki Fatool
 Legal Secretary to Nancy B. White
 BellSouth Telecommunications, Inc.
 150 South Monroe Street
 Suite 400
 Tallahassee, Florida 32301
 (305) 347-5560
vicki.fatool@bellsouth.com

B. Docket No. 041282-TP
 In re: Request for approval of amendment to interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. and Intermedia Communications, Inc.

Docket No. 041447-TP
 In re: Request for approval of amendment to interconnection, unbundling, resale, and collocation agreement between Intermedia Communications, Inc. and BellSouth Telecommunications, Inc.

C. BellSouth Telecommunications, Inc.
 on behalf of Nancy B. White

D. 4 pages total (including Bayo letter, Pleading and Certificate of Service)

E. BellSouth Telecommunications, Inc.'s Petition to Intervene

.pdf version attached

<<041282-T.pdf>>

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 117

CMP _____
 COM _____
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 MMS _____
 RCA _____
 SCR _____
 SEC j
 OTH kim P.

DOCUMENT NUMBER-DATE

01920 FEB 24 03

FPSC-COMMISSION CLERK

2/24/2005

ORIGINAL

Legal Department

NANCY B. WHITE
General Counsel - FL

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

February 24, 2005

Mrs. Blanca S. Bayó
Director, Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 041282-TP**
**In re: Request for approval of amendment to interconnection,
unbundling, resale, and collocation agreement between BellSouth
Telecommunications, Inc. and Intermedia Communications, Inc.**

Docket No. 041447-TP
**In re: Request for approval of amendment to interconnection,
unbundling, resale, and collocation agreement between Intermedia
Communications, Inc. and BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Petition to Intervene,
which we ask that you file in the captioned dockets.

Copies have been served to the parties shown on the attached Certificate
of Service.

Sincerely,


Nancy B. White

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

DOCUMENT NUMBER-DATE

01920 FEB 24 05

FPSC-COMMISSION CLERK

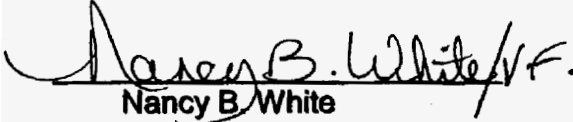
**CERTIFICATE OF SERVICE
DOCKET NOS. 041282-TP and 041447-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via First Class U.S. Mail and Electronic Mail this 24th day of February, 2005 to the following:

Victor McKay
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Telephone: (850) 413-6393
vmckay@psc.state.fl.us

Ms. Donna C. McNulty
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301-2960
Tel. No. (850) 219-1008
Fax. No. (850) 219-1018
donna.mcnulty@mci.com

Floyd Self, Esq.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302
Tel. No. (850) 222-0720
fself@lawfla.com


Nancy B. White

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for approval of amendment)
to interconnection, unbundling, resale, and)
collocation agreement between BellSouth)
Telecommunications, Inc. and Intermedia)
Communications, Inc.)
_____)

Docket No. 041282-TP

In re: Request for approval of amendment)
to interconnection, unbundling, resale, and)
collocation agreement between)
Intermedia Communications, Inc. and)
BellSouth Telecommunications, Inc.)
_____)

Docket No. 041447-TP

Filed: February 24, 2005

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR LEAVE TO INTERVENE**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rule 25-22.039, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefore states:

1. BellSouth is a telephone 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. BellSouth's principal place of business in Florida is 150 W. Flagler Street, Suite 1910, Miami, Florida 33130. Pleadings and process in this matter may be served upon:

Nancy B. White
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, Florida 32301

3. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of BellSouth and its business operations

DOCUMENT NUMBER-DATE

01920 FEB 24 05

FPSC-COMMISSION CLERK

in the State of Florida. Both Intermedia Communications, LLC and MCImetro Access Transmission Services, LLC are wholesale customers of BellSouth. BellSouth wishes to ensure that all outstanding bills and any system transfer costs are dealt with in the merger.

WHEREFORE, BellSouth respectfully requests that the Commission grant the Company leave to intervene for all legal purposes in this docket.

Respectfully submitted this 24th day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

JAMES MEZA III

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



R. DOUGLAS LACKEY

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

573064