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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.**

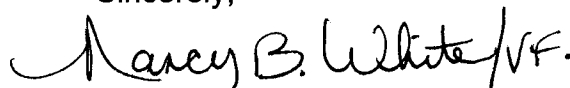
**Docket No. 041447-TP**  
**In re: Request for approval of amendment to interconnection,  
unbundling, resale, and collocation agreement between Intermedia  
Communications, Inc. and BellSouth Telecommunications, Inc.**

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

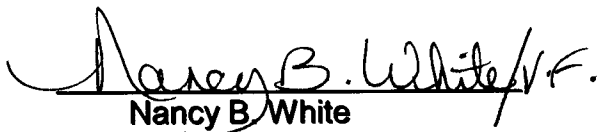
**CERTIFICATE OF SERVICE  
DOCKET NOS. 041282-TP and 041447-TP**

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](mailto:vmckay@psc.state.fl.us)

Ms. Donna C. McNulty  
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Suite 201  
Tallahassee, FL 32301-2960  
Tel. No. (850) 219-1008  
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Floyd Self, Esq.  
Messer, Caparello & Self, P.A.  
215 South Monroe Street  
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Tallahassee, FL 32302  
Tel. No. (850) 222-0720  
[fself@lawfla.com](mailto:fself@lawfla.com)

  
Nancy B. White

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

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

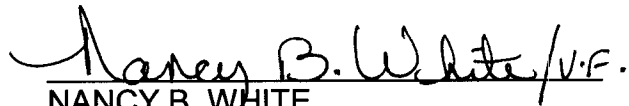
3. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of BellSouth and its business operations

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 24<sup>th</sup> day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in cursive, followed by a horizontal line and the initials "/v.F." to the right.

NANCY B. WHITE  
JAMES MEZA III  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

Handwritten signature of R. Douglas Lackey in cursive, followed by a horizontal line and the initials "/v.F." to the right.

R. DOUGLAS LACKEY  
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