

7037 Old Madison Pike, Suite 400 Huntsville, AL 35806

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March 15, 2004

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

Re: Docket No. 041269-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. and Business Telecom, Inc. are an original and fifteen copies of a Petition to Intervene in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Nanette Edwards Regulatory Attorney

Enclosures

Copy to: Parties of Record

Janette Edwards

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket)	
to consider amendments to)	
interconnection agreements resulting)	DOCKET NO. 041269-TP
from changes in law, by BellSouth)	Filed: March 15, 2005
Telecommunications, Inc.)	

PETITION TO INTERVENE

ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom d/b/a GrapeVine ("ITC^DeltaCom"), on behalf of itself, and its affiliate, Business Telecom, Inc. (hereinafter collectively referred to as "ITC^DeltaCom"), pursuant to Rules 25-22.039 and 28-106-205, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefore states:

- ITC^DeltaCom is 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:

ITC^DeltaCom Communications, Inc. 7037 Old Madison Pike, Suite 400 Huntsville, Alabama 35806.

3 Pleadings, orders, notices, and other papers filed or served in this matter should be served upon:

Nanette Edwards ITC^DeltaCom Communications, Inc. 7037 Old Madison Pike Suite 400 Huntsville, Alabama 35806

- 4. ITC^DeltaCom is authorized by the Florida Public Service Commission to provide local telecommunications services in the State of Florida.
- 5. ITC^DeltaCom has existing Commission approved interconnection agreements with BellSouth Telecommunications, Inc. and has substantial interests which will be subject to determination or will be affected by the resolution of issues in this proceeding.

WHEREFORE, ITC^DeltaCom respectfully requests that the Commission permit it to intervene in this proceeding and that it be accorded full party status.

Respectfully submitted this 15th day of March, 2005.

Nanette Edwards, Esq.

ITC^DeltaCom Communications, Inc.

1 Janette Edwards

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Suite 400

Huntsville, Alabama 35806

(256)382-3856

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by U.S. Mail this 15th day of March, 2005.

Manual Edwards
Nanette Edwards

Adam Teitzman, Esq.
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Tallahassee, FL 32399-0850

FCCA/CompSouth c/o Moyle Law Firm Vicki Gordon Kaufman 118 North Gadsden Street Tallahassee, FL 32301

MCI Dulaney O'Roark III, Esq. 6 Concourse Parkway Suite 600 Atlanta, GA 30328

Rutledge Law Firm Kenneth Hoffman/Martin McDonnell P. O. Box 551 Tallahassee, FL 32302

XO Communications, Inc. Dana Shaffer 105 Molloy Street Suite 300 Nashville, TN 37201

AT&T Communications of the Southern States, LLC Tracy Hatch, Esq. 101 North Monroe Street, Suite 700 Tallahassee, FL 32301 Tallahassee, FL 32302-1876

NuVox/NewSouth/Xspedius/KMC Telecom J.Heitmann/B.Mutschelknaus/S.Kassman c/o Kelley Drye & Warren LLP 1200 19th St., NW, Suite 500 Washington, DC 20036 BellSouth Telecommunications, Inc. N. White/D. Lackey/E. Edenfield c/o Ms. Nancy H. Sims 150 South Monroe Street, Ste. 400 Tallahassee, FL 32301-1556

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AT&T Sonia Daniels 1230 Peachtree Street, NE 4th Floor Atlanta, GA 30309

NuVox/New South/Xspedius/KMC Telecom Norman H. Horton, Jr. c/o Messer Law Firm P. O. Box 1876

Florida Cable Telecommunications Assn., Inc. Michael A. Gross 246 E. 6th Ave. Suite 100 Tallahassee, FL 32303 Supra Telecommunications & Information Systems, Inc. Steven Chaiken/Brian Chaiken 2901 SW 149th Avenue Suite 300 Miramar, FL 33027

Supra Telecommunications and Information Systems, Inc. Ann H. Shelfer/Jonathan Audu Koger Center - Ellis Building 1311 Executive Center Drive, Suite 220 Tallahassee, FL 32301-5067