Law Offices of Alan C. Gold, P.A.

1320 South Dixie Highway Suite 870 Coral Gables, FL 33146 305-667-0475, ext 1. 305-663-0799

Alan C. Gold, Esquire 305-667-0475, ext 1. e-mail: <u>aqold@kcl.net</u> James L. Parado, Esquire 305-667-0475, ext. 25 e-mail: jlp@kcl.pet

June 17, 2005

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

RE: <u>Docket No.:041269-TP</u>

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc..

Dear Ms. Bayo:

Enclosed for filing on behalf of Saturn Telecommunication Services, Inc. d/b/a STS Telecom ("STS") are the original and 15 copies of STS's Petition To Intervene in the above referenced docket.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to me in the stamped, self-addressed envelope provided. If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this filing.

Very trony yours N C. GØLD, PA

Enclosure:

cc: STS Telecom All Parties of Record

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BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition to establish generic Docket to consider amendments to Interconnection Agreements Resulting from changes in law, BellSouth Telecommunications, Inc.

Docket No.: 041269-TP Order No.: PSC-05-0639-PCO-TP

SATURN TELECOMMUNICATION SERVICES, INC. d/b/a STS TELECOM's PETITION TO INTERVENE

Pursuant to Rules 25-22.039 and 28-106.201(2), Florida Administration Code,

Saturn Telecommunications Services, Inc. d/b/a STS Telecom ("STS") files this Petition

To Intervene in the above-referenced docket. In support of this Petition, STS states as

follows:

1. Petitioner's full name and principal place of business are:

Saturn Telecommunications Services, Inc. d/b/a STS Telecom 12233 SW 55th Street #811 Cooper City, FL 33330

2. All pleadings, orders, notices and other correspondence with respect to

this docket should be addressed to:

Alan C. Gold, Esquire Alan C. Gold, P.A. 1320 South Dixie Highway Suite 870 Coral Gables, FL 33146 (305) 667-0475 (phone) (305) 663-0799 (fax) agold@kcl.net

3. STS is a duly certified competitive local exchange telecommunications

carrier ("CLEC"). As such, STS is generally subject to the rules, regulations and orders

of the Commission, and such rules, regulations and orders impact STS's ability to provide local exchange telecommunications service in Florida.

4. STS has an Interconnection Agreement with BellSouth Telecommunications, Inc. ("BellSouth") on file with and approved by the Commission. In this proceeding, BellSouth proposes that the Commission consider certain changes to BellSouth's Interconnection Agreements with CLECs in Florida. Accordingly, the decisions which the Commission makes in this proceeding will substantially affect STS's interests.

5. STS first learned about this docket when it received a facsimile transmission from the Florida Public Service Commission containing "Order Establishing Scope of Proceeding" and "Notice of Pending Docket" in Docket Number 041269-TP on June 14, 2005.

WHEREFORE, STS requests that the Commission issue an order permitting STS to intervene in this proceeding, affording STS party status consistent its rules, and directing all parties to serve on STS all filings hereafter made in this case.

Respectfully submitted,

ALAN C. GOLD, P.A. Gables One Tower 1320 South Dixie Highway Suite 870 Coral Gables, FL 33146 (305) 667-0475 (office) (305) 663-0799 (telefax)

BY: ALAN C. GOLD, ESQUIRE Florida Bar Number: 304875 JAMES L. PARADO, ESQUIRE Florida Bar Number: 0580910

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been

mailed on this 17th day of June 2005, to:

AT&T Communications of the Southern States, LLC Tracy Hatch, Esq. 101 North Monroe Street, Suite 700 Tallahassee, FL 32301 Phone: (850) 425-6360 Fax: (832) 213-0204 Email: thatch@att.com

BellSouth Telecommunications, Inc. N.White/D.Lackey/E.Edenfield/M.Mays c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: 850-222-1201 Fax: 222-8640 Email: <u>nancy.sims@bellsouth.com/nancy.white@bellsouth.com</u>

FCCA/CompSouth (Moyle) c/o Moyle Law Firm Vicki Gordon Kaufman 118 North Gadsden Street Tallahassee, FL 32301 Phone: 850-681-3828 Fax: 681-8788 Email: <u>vkaufman@movlelaw.com</u>

ITC^DeltaCom Ms. Nanette Edwards 7037 Old Madison Pike, Suite 400 Huntsville, AL 35806 Phone: (256) 382-3856 Fax: (256) 382-3936

Email: nedwards@itcdeltacom.com

MCI Dulaney O'Roark III, Esq. 6 Concourse Parkway Suite 600 Atlanta, GA 30328 Phone: 770-284-5498 Email: de.oroark@mci.com

MCImetro Access Transmission Services LLC Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: <u>donna.mcnulty@mci.com</u>

Messer Law Firm Floyd R. Self P. O. Box 1876 Tallahassee, FL 32302-1876 Phone: 850-222-0720 Fax: 224-4359 Email: <u>fself@lawfla.com</u>

NuVox/NewSouth/Xspedius/KMC Telecom (Kelley) J.Heitmann/B.Mutschelknaus/S.Kassman c/o Kelley Law Firm 1200 19th St., NW, Suite 500 Washington, DC 20036 Phone: 202-877-1254 Fax: 202-955-9792 Email: JHeitman@KelleyDrye.com/SKassman@KelleyDrye.com

NuVox/NewSouth/Xspedius/KMC Telecom (Messer) Norman H. Horton, Jr. c/o Messer Law Firm P.O. Box 1876 Tallahassee, FL 32302-1876 Phone: 850-222-0720 Fax: 224-4359 Email: nhorton@lawfla.com

Rutledge Law Firm Kenneth Hoffman/Martin McDonnell P.O. Box 551 Tallahassee, FL 32302 Phone: 850-681-6788 Fax: 850-681-6515 Email: <u>marty@reuphlaw.com</u>

SECCA/US LEC Corp. Wanda Montano/Terry Romine 6801 Morrison Blvd. Charlotte, NC 28211 Phone: 770-319-1119 Fax: 770-602-1119

Email: wmontano@uslec.com

Supra Telecommunications & Information Systems, Inc.(05) Steven Chaiken/Brian Chaiken 2901 SW 149th Avenue Suite 300 Miramar, FL 33027 Phone: 786-455-4239 Fax: 786-455-4600

Email: Brian.Chaiken@STIS.com

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 Phone: (850) 402-0510 Fax: 402-0522 Email: ashelfer@stis.com

XO Communications, Inc. Dana Shaffer 105 Molloy Street, Suite 300 Nashville, TN 37201 Phone: 615-777-7700 Fax: 615-850-0343

Email: dana.shaffer@xo.com

Florida Public Service Commission Mr. Adam Teitzman 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850

Email: ateitzman@psc.state.fl.us

Sprint Communications Company Limited Partnership Susan S. Masterton, Esquire 1313 Blair Stone Road P.O. Box 2214 Tallahassee, FL 32316-2214 Email: susan.masterton@mail.sprint.com

Meredith Mays, Esq. Senior Regulatory Counsel BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, FL 32301-1556

Tallahassee, FL 32399-0850 2540 Shumard Oak Boulevard Division of Legal Services Florida Public Service Commission Carris (Lee) Fordham, Staff Counsel

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

IAMES L. PARADO, ESQUIRE Florida Bar Number: 304875 FLAN & GOLD, ESQUIRE :YA

Florida Bar Number: 0580910