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ORIGINAL

From: Peg Griffin [pgriffin@moylelaw.com]
Sent: Monday, November 07, 2005 2:26 PM
To: Filings@psc.state.fl.us
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Subject: E-filing; Docket Nos. 050119-TP and 050125-TP
Attachments: Petition to Intervene.pdf

CMP Attorney responsible for filing: Vicki Gordon Kaufman
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GCL Docket No and title: Petition of TDS Telecom d/b/a TDS Telecom/Quincy Telephone, ALLTEL Florida, Inc., Northeast Florida Telephone Company d/b/a NEFCOM, GTC, Inc. d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom, ITS Telecommunications Systems, Inc. and Frontier Communications of the South, LLC, concerning BellSouth Telecommunications, Inc.'s Transit Service Tariff Docket No. 050119-TP

OPC

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SEC 1 Petition and Complaint of AT&T Communication of the Southern States, LLC for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc. Docket No. 050125-TP

OTH kump.

Filed on behalf of: NuVox Communications, Inc. (NuVox)

Number of pages: 4
Document attached: Petition to Intervene

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RECEIVED NUMBER-DATE

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11/7/2005

FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of TDS Telecom d/b/a
TDS Telecom/Quincy Telephone,
ALLTEL Florida, Inc., Northeast Florida
Telephone Company d/b/a NEFCOM,
GTC, Inc. d/b/a GT Com, Smart City
Telecommunications, LLC d/b/a Smart
City Telecom, ITS Telecommunications
Systems, Inc. and Frontier Communications
of the South, LLC, concerning BellSouth
Telecommunications, Inc.'s Transit Service
Tariff

Docket No. 050119-TP

Petition and Complaint of AT&T Communication
of the Southern States, LLC for suspension and
cancellation of Transit Traffic Service Tariff
No. FL2004-284 filed by BellSouth
Telecommunications, Inc.

Docket No. 050125-TP

Filed: November 7, 2005

NUVOX COMMUNICATIONS, INC.'S PETITION TO INTERVENE

NuVox Communications, Inc. (NuVox), through its undersigned counsel,
pursuant to rule 25-22.039 and 28-106.205, Florida Administrative Code, files its Petition
to Intervene in this docket. As grounds therefore, NuVox states:

1. The affected agency is the Florida Public Service Commission, 2450
Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

2. The name and address of the Petitioner is:

NuVox Communications, Inc.
Two North Main Street
Greenville, SC 29601

3. Copies of all pleadings, notices, and orders in these dockets should be
provided to:

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond & Sheehan, PA
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Tallahassee, Florida 32301
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Susan J. Berlin
NuVox Communications, Inc.
Two North Main Street
Greenville, SC 29601
864.331.7323
864.672.5105 fax
sberlin@nuvox.com

4. NuVox is a competitive local exchange company operating in the state of Florida.
5. In these consolidated dockets, the Commission will consider the Transit Traffic Service Tariff filed by BellSouth Telecommunications, Inc. (BellSouth). Such action will directly affect NuVox's substantial interests. NuVox's interests are of the type this proceeding was designed to protect.
6. Disputed issues of material fact include, but are not limited to, whether the Commission should approve, modify or deny the BellSouth tariff; what compensation, if any, is appropriate under the tariff; if the tariff is approved, to whom should the tariff apply.
7. Ultimate facts include, but are not limited to, what tariff, if any should be approved by the Commission.

WHEREFORE, NuVox requests that the Commission enter an order allowing it to intervene as a full party in this docket.

s/ Vicki Gordon Kaufman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene was served via electronic mail and first class United States mail this 7th day of November, 2005, to the following:

Jason Rojas
Florida Public Service Commission
Division of Legal Services
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Tallahassee FL 32399-0850
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AT&T Communications of the Southern
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s/Vicki Gordon Kaufman
Vicki Gordon Kaufman

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of TDS Telecom d/b/a
TDS Telecom/Quincy Telephone,
ALLTEL Florida, Inc., Northeast Florida
Telephone Company d/b/a NEFCOM,
GTC, Inc. d/b/a GT Com, Smart City
Telecommunications, LLC d/b/a Smart
City Telecom, ITS Telecommunications
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s/ Vicki Gordon Kaufman

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