

ORIGINAL

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Subject: E- Filing -- Dockets 050119-TP and 050125-TP
Attachments: Petition to Intervene.pdf

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Docket Nos. and titles: 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 on behalf of: *OK* Competitive Carriers of the South, Inc. (CompSouth)

Number of pages: *14* 4

Document attached: Petition to Intervene

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12/12/2005

DOCUMENT NUMBER DATE
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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: December 12, 2005

COMPSOUTH'S PETITION TO INTERVENE

Competitive Carriers of the South, Inc. (CompSouth), 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, CompSouth 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:

Competitive Carriers of the South, Inc.
118 North Gadsden Street
Tallahassee, FL 32301

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

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4. CompSouth is a not-for-profit corporation whose members provide competitive telecommunications services in the state.

5. In these consolidated dockets, the Commission will consider the Transit Traffic Service Tariff filed by BellSouth Telecommunications, Inc. (BellSouth). The action the Commission takes on this tariff as well as its action on the other issues identified in this docket will directly affect CompSouth's substantial interests. CompSouth'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, CompSouth 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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Attorneys for CompSouth

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 12th day of December, 2005, to the following:

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