

**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

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**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:

Vicki Gordon Kaufman  
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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 12<sup>th</sup> day of December, 2005, to the following:

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