

ORIGINAL

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December 16, 2005

VIA OVERNIGHT DELIVERY

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED FPSC
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COMMISSION
CLERK

Re: Docket No. 050119/050125-TP

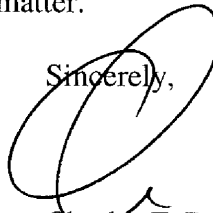
Dear Ms. Bayó:

Enclosed for filing on behalf of Verizon Wireless are an original and eight (8) copies of Verizon Wireless's Petition to Intervene in the above referenced consolidated dockets, along with an original and sixteen (16) copies of the Testimony of Marc B. Sterling on behalf of Verizon Wireless. Copies are being served on the parties in this docket pursuant to the attached certificate of service. Please return to me in the enclosed stamped envelope one copy of each of these filings.

If you should have any questions regarding this filing, please do not hesitate to call me.

Thank you for your consideration in this matter.

- CMP _____
- COM 5
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- RCA _____ CFP/dpo
- SCR _____ Enclosures
- SGA _____
- SEC 1
- OTH Kum P.

Sincerely,


Charles F. Palmer

cc: All Parties of Record
Ms. Laura King
Mr. Paul Vickery
Felicia Banks, Esq.

81-01 NW 61 DEC 19 05

RECEIVED & FILED
Petition
DOCUMENT NUMBER-DATE

11702 DEC 19 05

Testimony
DOCUMENT NUMBER-DATE
11703 DEC 19 05
FPSC-COMMISSION CLERK

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of TDS Telecom d/b/a)	
TDS Telecom/Quincy Telephone,)	
ALLTEL Florida, Inc., Northeast Florida)	Docket No. 050119-TP
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)	
)	
Petition and Complaint of AT&T Communications)	
Of the Southern States, LLC for suspension and)	Docket No. 050125-TP
Cancellation of Transit Traffic Service Tariff)	
No. FL2004-284 filed by BellSouth)	
Telecommunications, Inc.)	Filed December 16, 2005

VERIZON WIRELESS'S PETITION TO INTERVENE

Pursuant to Rules 25-22.039 and 28-106.205 of the Florida Administrative Code, Cellco Partnership d/b/a/ Verizon Wireless ("Verizon Wireless"), through its undersigned counsel, files its Petition to Intervene in this proceeding. In support of its Petition, Verizon Wireless respectfully states as follows:

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 are as follows:

Verizon Wireless
Legal & External Affairs Department
1300 I Street, N.W. -- Suite 400 West
Washington, DC 20005

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

Charles F. Palmer
Troutman Sanders LLP
600 Peachtree Street, N.E.
Suite 5200
Atlanta, GA 30308-2216
charles.palmer@troutmansanders.com

Elaine D. Critides
Verizon Wireless
Legal & External Affairs Department
1300 I Street, N.W. -- Suite 400 West
Washington, D.C. 20005
elaine.critides@verizonwireless.com

4. Verizon Wireless is licensed by the Federal Communications Commission to provide Commercial Mobile Radio Service ("CMRS") in Florida.

5. In these consolidated dockets, the Commission will consider BellSouth Telecommunications, Inc.'s ("BellSouth") Transit Traffic Service Tariff. The Commission's actions in these dockets will directly affect Verizon Wireless's substantial interests. By way of example, Verizon Wireless has entered into an interconnection agreement with BellSouth, which agreement and potential renewals may be affected by these dockets. Verizon Wireless's interests are of the type that this consolidated proceeding is designed to protect.

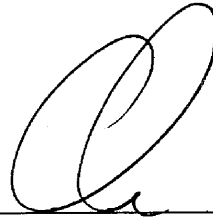
6. No other party can adequately represent Verizon Wireless's substantial interests in these proceedings.

7. Disputed issues of material fact include, but are not limited to, the scope of the tariff's application and whether the Commission should approve, modify, or deny BellSouth's Transit Traffic Service. Disputed issues of law include, but are not limited to, who is responsible for compensating BellSouth when it provides transit services. Verizon Wireless anticipates that additional disputed issues of material fact and issues of law will be identified during the discovery conducted in these consolidated proceedings.

8. Ultimate facts include, but are not limited to, the tariff, if any, that should be approved by the Commission.

WHEREFORE, Verizon Wireless respectfully requests that the Commission enter an Order allowing it to intervene as a full party of record in these consolidated dockets.

This 16th day of December 2005.



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