

ORIGINAL

Matilda Sanders

From: Peg Griffin [pgriffin@moylelaw.com]
 Sent: Tuesday, September 12, 2006 3:15 PM
 To: Filings@psc.state.fl.us
 Cc: Vicki Gordon Kaufman; Gene Watkins ; Patrick Wiggins; james.meza@bellsouth.com; manuel.gurdian@bellsouth.com; Nancy Sims; Charles Beck
 Subject: E-filing - Docket No. 060598-TL
 Attachments: Petition to Intervene.pdf

CMP _____
 COM _____
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 RCA _____
 SCR _____
 SGA _____
 SEC _____

Attorney responsible for filing: Vicki Gordon Kaufman
 118 N. Gadsden Street
 Tallahassee, FL 32301
 Telephone: (850) 681-3828
 Facsimile: (850) 681-8788
 vkaufman@moylelaw.com

Docket No. and title: In re: Petition by BellSouth Telecommunications, Inc., pursuant to Florida Statutes §364.001(4) to Recover 2005 Tropical System Related Costs and Expenses
 Docket No. 060598-TL

Filed on behalf of: Competitive Carriers of the South, Inc.

Number of pages: 3

Document attached: Petition to Intervene

Peg G. Griffin
 Assistant to Vicki Gordon Kaufman
 Moyle, Flanigan, Katz, Raymond White & Krasker, P.A.
 118 N. Gadsden Street
 Tallahassee, FL 32301
 Telephone: (850) 681-3828
 Facsimile: (850) 681-8788
 E-mail: pgriffin@moylelaw.com

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein.

The information contained in this electronic mail transmission may be attorney/client privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone collect at 850-681-3828. Thank you.

DOCUMENT NUMBER-DATE

08305 SEP 12 06

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth
Telecommunications, Inc., pursuant to
Florida Statutes §364.051(4) to
Recover 2005 Tropical System
Related Costs and Expenses

Docket No. 060598-TL

Filed: September 12, 2006

COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
PETITION TO INTERVENE

The Competitive Carriers of the South, Inc. (CompSouth), pursuant to rule 25-22.039, Florida Administrative Code, file this Petition to Intervene in the above referenced docket. CompSouth requests that its petition be granted, that it be designated as a party of record, and that it be afforded all applicable rights under Florida law and under the rules and regulations of the Florida Public Service Commission (Commission).

As grounds therefore, CompSouth states:

1. Petitioner's principal place of business is:

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

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

this docket should be addressed to:

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond & Sheehan, PA
118 North Gadsden Street
Tallahassee, Florida 32301
850.681.3828
vkaufman@moylelaw.com

3. CompSouth is a not-for-profit corporation whose members provide competitive telecommunications services in the State of Florida. In this docket, the Commission will address BellSouth Telecommunications, Inc.'s (BellSouth) request that it be permitted to recover a \$.50 per month surcharge assessed on basic and nonbasic

local exchange service lines and on all unbundled wholesale loop network element (UNE) customers. CompSouth members are a group of companies whose members include UNE customers of BellSouth and whose interests will be substantially affected by this Commission's action on BellSouth's request. Thus, CompSouth's members' substantial interests will be affected by this proceeding and CompSouth has standing to intervene.

4. Disputed issues of fact include, but are not limited to, whether it is appropriate to apply the requested surcharge to UNE customers.

5. Ultimate facts alleged include, but are not limited to, the fact that it is neither appropriate nor legal, pursuant to federal law, to apply BellSouth's proposed surcharge to UNE customers.

6. Any determinations and actions in this docket regarding BellSouth's surcharge request will affect the substantial interests of CompSouth members as CLECs operating in Florida. CompSouth has standing under Chapter 120, Florida Statutes, and applicable rules to be granted intervention in this proceeding.

WHEREFORE, CompSouth requests the Commission to enter an Order authorizing it to intervene as a full party to this proceeding.

s/ Vicki Gordon Kaufman
Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond & Sheehan,
PA
118 North Gadsden Street
Tallahassee, Florida 32301
850.681.3828
vkaufman@moylelaw.com

Attorneys for CompSouth

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene was furnished by (*) electronic mail and U.S. Mail this 12th day of September, 2006 to:

(*) Patrick Wiggins
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
pwiggins@psc.state.fl.us

(*) James Meza III
Manuel A. Gurdian
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
james.meza@bellsouth.com
manuel.gurdian@bellsouth.com
nancy.sims@bellsouth.com

(*) Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Beck.Charles@leg.state.fl.us

S/ Vicki Gordon Kaufman
Vicki Gordon Kaufman