

Dorothy Menasco

From: Woods, Vickie [vf1979@att.com]
Sent: Friday, February 22, 2008 1:31 PM
To: Filings@psc.state.fl.us
Subject: 080089-TP AT&T Florida's Petition for Leave to Intervene
Importance: High
Attachments: 080089-T.pdf

- A. Vickie Woods
 Legal Secretary to E. Earl Edenfield, Jr., Tracy W. Hatch
 and Manuel A. Gurdian
 AT&T Florida
 150 South Monroe Street
 Suite 400
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- B. Docket No.: 080089-TP:
 Petition of Intrado Communications, Inc. for Declaratory Statement Regarding Local
 Exchange Telecommunications Network Emergency 911 Service
- C. AT&T Florida
 on behalf of Manuel A. Gurdian
- D. 5 pages total (including letter, pleading and certificate of service)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Petition for Leave to Intervene
 .pdf

<<080089-T.pdf>>

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2/22/2008



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February 22, 2008

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

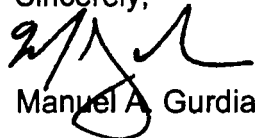
**Re: Docket No. 080089-TP:
Petition of Intrado Communications, Inc. for Declaratory
Statement Regarding Local Exchange Telecommunications
Network Emergency 911 Service**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Petition for Leave to Intervene, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.
Lisa S. Foshee

CERTIFICATE OF SERVICE
Docket No. 080089-TP

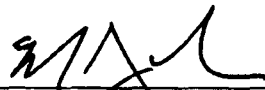
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 22nd day of February, 2008 to the following:

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Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Intrado)
Communications, Inc. for Declaratory) Docket No. 080089-TP
Statement Regarding Local Exchange)
Telecommunications Network)
Emergency 911 Service)
_____) Filed: February 22, 2008

AT&T FLORIDA'S PETITION FOR LEAVE TO INTERVENE

BellSouth Telecommunications, Inc. d/b/a ("AT&T Florida"), pursuant to Rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby requests leave to intervene in this proceeding and as grounds therefore states:

1. AT&T Florida is an Incumbent Local Exchange Company ("ILEC") lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.

2. AT&T Florida's principal place of business is 675 West Peachtree Street, Atlanta, Georgia 30375. Pleadings and process in this matter may be served upon:

E. Earl Edenfield, Jr.
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Manuel A. Gurdian
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Lisa S. Foshee
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3. AT&T Florida has become aware of the Petition for Declaratory Statement filed by Intrado Communications Inc. ("Petition") that is the basis for the instant docket. The Petition seeks a declaration by the Commission as to the appropriate application of certain AT&T Florida tariffs as well as a customer's rights and obligations pursuant to certain AT&T Florida tariffs. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of AT&T Florida and its business operations in the State of Florida.

4. The Petition raises numerous disputed issues, including but not limited to, whether the Petition is an appropriate mechanism to seek a declaration regarding the application of AT&T Florida's tariffs, whether AT&T Florida's existing tariffs are appropriate in provision of 911 Service and whether Intrado is eligible for an interconnection agreement with AT&T Florida for the purpose of providing its proposed 911 Service.

5. Although the Petition appears to have been filed on February 8, 2008, AT&T was not served by Intrado with the Petition, despite Intrado's request for a determination of AT&T Florida's rights and obligations in addition to Intrado's own. Thus, the requirement to respond within 20 days after service does not apply. Nevertheless, in an abundance of caution, AT&T Florida requests that the Commission grant it an extension until March 7, 2008 to file an appropriate responsive pleading (i.e. Motion to Dismiss and/or Answer and Affirmative Defenses).

WHEREFORE, AT&T Florida respectfully requests that the Commission grant the Company leave to intervene for all legal purposes in this docket and to grant it until March 7, 2008 to file an appropriate responsive pleading to Intrado's Petition.

Respectfully submitted this 22nd day of February, 2008.

AT&T FLORIDA



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