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April 1, 2008

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COMMISSION
CLERK

VIA HAND DELIVERY

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

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

Dear Ms. Cole:


Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of the Amended Petition for Leave to Intervene by Windstream Florida, Inc.

Please acknowledge receipt and filing of the above by stamping the duplicate of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

CMP _____
COM _____
CTR _____
ECR _____
GCL 2 _____
OPC _____
RCA _____
SCR _____
SGA _____
SEC _____
OTH _____

Sincerely,



J. Jeffrey Wahlen

OPC _____ JJW/jh
RCA _____ cc: Parties of Record

SCR _____ h:\jjw\windstream\intrado 080089\ltr.cole.033108.doc

DOCUMENT NUMBER-DATE

02463 APR-1 08

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for declaratory statement)
Regarding local exchange telecommunications)
Network emergency 911 service, by Intrado) Docket No. 080089-TP
Communications, Inc,) April 1, 2008
_____)

AMENDED PETITION FOR LEAVE TO INTERVENE

Windstream Florida, Inc. ("Windstream"), in accordance with Rule 28-105.0027, Florida Administrative Code, by and through its undersigned counsel, hereby files this amended petition for leave to intervene in the above referenced docket.¹ In support of this Amended Petition, Windstream states as follows:

General

1. Windstream is a local exchange telecommunications company certificated by the Commission under Chapter 364, Florida Statutes.

2. The name and address of Petitioner are as follows:

Windstream Florida, Inc.
4001 Rodney Parham Road
Mailstop: 1170-B1F03-53A
Little Rock, Arkansas 72212
Attn: Bettye Willis

¹ Windstream filed its original petition to intervene on March 21, 2008 and believes that it is legally sufficient to warrant an order granting it; however, in light of the position that Intrado has taken in its response to Windstream's petition, Windstream is filing this amended petition in the abundance of caution and to avoid unnecessary controversy. Windstream notes that this amended petition to intervene is very similar to the petition to intervene filed in this docket by Embarq Florida, Inc. and that Intrado did not object to Embarq's petition to intervene.

DOCUMENT NUMBER - DATE

02463 APR-1 8

FPSC-COMMISSION CLERK

3. All pleadings, orders and correspondence should be directed to Petitioner's representatives as follows:

J. Jeffrey Wahlen
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
Phone: 850.425.5471
Fax: 850.222.7560
Email: jwahlen@ausley.com

Bettye J. Willis
4001 Rodney Parham Road
Mailstop: 1170-B1F03-53A
Little Rock, Arkansas 72212
Phone: 501.748.5692
Fax: 501.748.7996
Email: bettye.j.willis@windstream.com

4. The agency affected by this Amended Petition to Intervene is:

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

5. Windstream received notice of Intrado's petition through the notice published by the Commission in the March 7, 2008 edition of the Florida Administrative Weekly.² Windstream became aware of Intrado's amended petition on or about March 21, 2008, by reviewing the FPSC's website.

6. In this docket Intrado has asked the Commission to issue a declaratory statement relating to the obligations of ILECs, Intrado and Public Service Answering Points (PSAPs) when Intrado becomes the primary E911 provider for a PSAP. (See, Intrado's Amended Petition at paragraph 11)

7. As an ILEC in Florida that provides and receives compensation for 911 services under tariffs and contracts in its service territory throughout Florida, Windstream is directly and substantially affected by the Commission's consideration of a ruling on Intrado's Amended

² Intrado filed its original petition on February 8, 2008 and a Motion to Accept and an Amended Petition on March 14, 2008. Windstream believes that an additional notice in the Florida Administrative Weekly may be required and that the 90-day clock for the Commission's ruling has been restarted.

Petition. The amended petition specifically cites Windstream's tariff and seek a declaration of Intrado's rights under that tariff.

8. Issues of material fact in dispute in this proceeding include, but are not necessarily limited to:

Whether Windstream may provide services to Intrado or the PSAP when Intrado is the primary E911 provider to the PSAP.

Whether Windstream is entitled to compensation for any E911 services Windstream may provide to Intrado or a PSAP when Intrado is the primary E911 provider to the PSAP.

Whether the manner in which Windstream may charge Intrado or a PSAP for the E911 services it provides is anticompetitive.

9. The ultimate facts entitling Windstream to relief are that any charges Windstream imposes on competitive primary 911 providers, such as Intrado, or PSAPs are in accordance with the governing laws and Windstream's lawful tariffs.

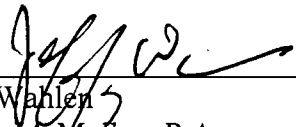
10. The statutes, laws and rules entitling Windstream to relief are Sections 102.57, 364.01, 364.04, 364.051, 364.08 and 374.10, Florida Statutes and related administrative rules, and Windstream's Florida General Exchange Tariffs filed in accordance with applicable laws and rules.

11. The relief Windstream requests is for the Commission to dismiss or deny Intrado's Amended Petition, as more fully set forth in the Windstream's Motion to Dismiss or, in the Alternative, Deny Intrado's Amended Petition, filed on April 1, 2008.

WHEREFORE, Windstream requests that the Commission grant its Amended Petition to Intervene.

Respectfully submitted this 1st day of April, 2008.

WINDSTREAM FLORIDA, INC.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S.

Mail (or Hand Delivery*) this 1st day of April, 2008 to the following:

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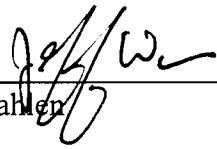
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J. Jeffry Walker