



ORIGINAL

Florida Cable Telecommunications Association

Steve Wilkerson, President

November 20, 1997

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket Numbers: 960833-TP, 960846-TP, 960757-TP, 971140-TP

Dear Ms. Bayo:

Enclosed for filing in the above-captioned docket are an original and fifteen (15) copies of Florida Cable Telecommunications Association, Inc.'s Petition for Leave to Intervene. Copies have been served on the parties of record pursuant to the attached certificate of service.

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

Thank you for your assistance in processing this filing.

ACK Yours very truly,
AFA 1 - FYI
APP [Signature]
CAF Laura L. Wilson
Vice President, Regulatory Affairs &
Regulatory Counsel
CMU
CTR
EAG Enclosures
LEG 2 cc. All Parties of Record
LIN 5 Mr. Steve E. Wilkerson
OFC
RCH
SEC 1
WAS
OTH [Signature]

DOCUMENT NUMBER - DATE
11933 NOV 20 97
FPSC - RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of AT&T Communications of the Southern States, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning <i>interconnection and resale</i> under the Telecommunications Act of 1996.)	Docket No. 960833-TP
)	
In re: Petition by MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning interconnection and resale under the Telecommunications Act of 1996.)	Docket No. 960846-TP
)	
In re: Petition by Metropolitan Fiber Systems of Florida, Inc. for arbitration with BellSouth Telecommunications, Inc. concerning interconnection rates, terms, and conditions, pursuant to the Federal Telecommunications Act of 1996.)	Docket No. 960757-TP
)	
In re: MCI Metro Access Transmission Services, Inc. to set <i>non-recurring charges for combinations</i> of network elements with BellSouth Telecommunications, Inc.)	Docket No. 971140-TP
)	
)	Filed: November 20, 1997

PETITION FOR LEAVE TO INTERVENE

The Florida Cable Telecommunications Association, Inc., ("FCTA") by and through undersigned counsel and pursuant to Rule 25-22.039, Florida Administrative Code, submits the following Petition for Leave to Intervene as a full party of record to the above-captioned proceeding. In support thereof, FCTA states:

1. All notices, pleadings and correspondence should be sent to:

Laura L. Wilson
Florida Cable Telecommunications Association
310 North Monroe Street
Tallahassee, FL 32301
(850) 681-1990
(850) 681-9676 (fax)

DOCUMENT NUMBER-DATE

11933 NOV 20 5

FPSC-REGISTRY/REPORTING

2. FCTA is the principle trade association of the cable telecommunications industry in Florida. FCTA represents and requests intervention in this consolidated proceeding on behalf of its members' certificated telecommunications companies who are authorized to provide alternative local exchange telecommunications service in the State of Florida. These telecommunications companies are: Comcast MH Telephony, Comcast Telephony Communications, MediaOne Fiber Technologies, Inc., MediaOne Florida Telecommunications, Inc., Time Warner AxS of Florida, L.P. (d/b/a Time Warner Communications), and Digital Media Partners. These telecommunications companies are, or intend to be, facilities-based LEC competitors. FCTA's business address is:

Florida Cable Telecommunications Association
310 North Monroe Street
Tallahassee, FL 32301
(850) 681-1990
(850) 681-9676 (fax)

FCTA's Substantial Interests

3. Because the certificated telecommunications companies represented by FCTA provide, or will provide, facilities-based local telecommunications services which require interconnection with and unbundled network elements from BellSouth, they have a real, direct, and substantial interest that will be affected by the outcome of this consolidated proceeding. Specifically, the cost model and pricing methodology adopted by the Commission in these dockets, as well as the prices approved, will dictate the terms under which the companies will be able to interconnect with and purchase Unbundled Network Elements ("UNEs") from BellSouth. Moreover, like intervenor ACSI, Time Warner Communications and Digital Media Partners have a Most Favored Nations ("MFN") clause in their interconnection agreement with BellSouth. The prices here at issue will be available and used by multiple providers who have MFN clauses. Therefore, intervention is appropriate.

4. The other certificated telecommunications companies represented by FCTA are able to interconnect with BellSouth pursuant to the December 7, 1995, FCTA-BellSouth interconnection agreement. That agreement only intended to set interim rates:

Because the undersigned parties lack sufficient data with respect to the volumes of local terminating traffic being delivered to each LEC and ALEC, the prices, terms and conditions of local interconnection agreed to herein are deemed transitional in nature. The parties deem them acceptable only in the interest of compromise to enable the introduction of local exchange competition to Florida's consumers beginning January 1, 1996.

December 7, 1995, FCTA-BellSouth Stipulation and Agreement at p.9. The agreement expires on December 31, 1997. Thereafter, the permanent rates set in this proceeding will be available to the certificated companies FCTA represents. Due to the expiration of the FCTA-BellSouth agreement, such companies have a direct and immediate interest in the pricing of and methodology used to price interconnection and UNEs. In order to protect its members' interests in the resolution of these matters, and in order to facilitate the resolution of these issues in an efficient and judicious manner, FCTA should be allowed to intervene in this proceeding.

5. Participation by FCTA will contribute to the efficient use of the Commission's resources. Participation in this proceeding could stave off the necessity for further arbitrations or proceedings relative to the fundamental legal and policy issues to be resolved in this proceeding.

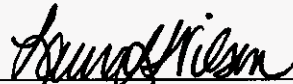
6. Moreover, full participation by interested parties such as FCTA will assist the Commission in adopting price methodologies and cost models which apply fairly to all ALECs. As facilities-based competitive providers, the certificated telecommunications companies represented by FCTA have interests and concerns that will not be fully represented by primarily reseller parties to this proceeding. Participation by FCTA will aid the Commission in

evaluating the methodologies and models put forth by other parties to this proceeding by bringing to light interests and concerns that would otherwise not be expressed.

7. FCTA only intends to file rebuttal testimony and will cooperate to the fullest extent possible with other ALECs in this proceeding to promote judicial efficiency and economy.

WHEREFORE, for the foregoing reasons, FCTA requests that it be permitted to intervene in this proceeding, on behalf of the aforementioned telecommunications companies, as a full party of record.

Respectfully submitted this 20th day of November, 1997.



Laura L. Wilson, Esquire
Vice President, Regulatory Affairs
Florida Cable Telecommunications Association, Inc.
310 North Monroe Street
Tallahassee, FL 32301
(850) 681-1990
(850) 681-9676 (fax)

CERTIFICATE OF SERVICE

DOCKET NOs. 960833-T.P., 960846-T.P., 960757-T.P., 971140-T.P.

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene has been furnished by hand delivery (*) and/or U.S. Mail on this 20th day of November, 1997 to the following parties of record:

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By: _____

Anna Wilson