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Florida Cable Telecommunications Association

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Steve Wilkerson, President

**VIA HAND DELIVERY**

June 17, 2002

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

**RE: Docket No. 000121C-TP**

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and 15 copies of the Florida Cable Telecommunications Association, Inc.'s Petition for Leave to Intervene.

Copies of the petition have been served on the parties of record pursuant to the attached certificate of service. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael A. Gross', is written over a faint, larger version of the same signature.

Michael A. Gross  
Vice President, Regulatory Affairs &  
Regulatory Counsel

MAG/mj

Enclosure

cc: All Parties of Record

DOCUMENT NUMBER - DATE  
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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene of the Florida Cable Telecommunications Association in Docket 000121C-TP has been served upon the following parties by U.S. Mail this 17<sup>th</sup> day of June, 2002:

Kimberly Caswell, Esquire  
GTE Florida Incorporated  
P.O. Box 110, FLTC0007  
Tampa, FL 33601

101 N. Monroe St., Suite 700  
Tallahassee, FL 32301-1549

Peter M. Dunbar, Esquire  
Marc W. Dunbar, Esquire  
Pennington, Moore, Wilkinson, Bell &  
Dunbar, P.A.  
P.O. Box 10095  
Tallahassee, FL 32302-2095

Donna Canzano McNulty  
MCI WorldCom  
325 John Knox Road, Suite 105  
Tallahassee, FL 32301

Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069

Brian Chaiken  
Supra Telecom  
1311 Execu"ve Center Drive, Suite 200  
Tallahassee, FL 32301

Kenneth A. Hoffman  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
P.O. Box 551  
Tallahassee, FL 32302-0551

Intermedia Communications, Inc.  
Scott Sappersteinn  
One Intermedia Way  
M.C. FLT-HQ3  
Tampa, FL 33647-1752

Norman H. Horton  
Messer, Caparello & Self, P.A.  
215 South Monroe Street  
Suite 701  
Tallahassee, FL 32302-1876

Nanette Edwards  
ITC DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802

Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Jason K. Fudge  
Tim Vaccaro  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850

Marsha Rule  
AT&T Communications of the Southern  
States, Inc.

Charles J. Pellegrini  
Wiggins & Villacorta, P.A.  
2145 Delta Blvd  
Suite 200  
Tallahassee, FL 32302

Susan Masterton

Charles Rehwinkel  
Sprint  
P.O. Box 2214  
MS: FLTLHO0107  
Tallahassee, FL 32316-2214

Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328

Catherine F. Boone, Esq.  
Covad Communications Company  
10 Glenlake Parkway  
Suite 650  
Atlanta, GA 30328

John Rubino  
George S. Ford  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, FL 33602

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, Kaufman, et. al  
117 South Gadsden Street  
Tallahassee, FL 32301

Jonathan E. Canis  
Michael B. Hazzard  
Kelley Drye & Warren, LLP  
1200 19<sup>th</sup> Street, NW, 5<sup>th</sup> Floor  
Washington, DC 20036

Tad J. Sauder  
Manager, ILEC Performance Data  
Birch Telecom of the South, Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108

John D. McLaughlin, Jr.  
KMC Telecom  
1755 North Brown Road  
Lawrence, GA 30043

Andrew O. Isar  
Ascent  
3220 Uddenberg Lane, NW  
Suite 4  
Gig Harbor, WA 98335

Richard D. Melson  
Hopping, Green, Sams & Smith  
P.O. Box 6526  
Tallahassee, FL 32314

Jeremy Marcus  
Elizabeth Braman  
Blumenfeld & Cohen  
1625 Massachusetts Ave., N.W.  
Suite 500  
Washington, DC 20036

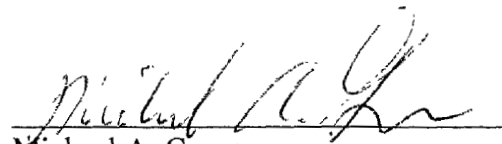
Renee Terry, Esq.  
e.spire Communications, Inc.  
131 National Business Parkway  
Suite 100  
Annapolis Junction, MD 20701

John Kerkorian  
Mpower Communications, Corp.  
5607 Glenridge Drive  
Suite 300  
Atlanta, GA 30342

Suzanne F. Summerlin, Esq.  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301

Dulaney O'Roark, III  
WorldCom, Inc.  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328

William Prescott  
AT&T Communications  
Senior Attorney  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309



Michael A. Gross

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Investigation into the establishment )  
of operations support systems permanent )  
performance measures for incumbent local )  
exchange telecommunications companies )  
(VERIZON FLORIDA TRACK)**

**Docket No. 000121C-TP**

**Filed: June 17, 2002**

**PETITION OF FLORIDA CABLE TELECOMMUNICATIONS  
ASSOCIATION FOR LEAVE TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA"), hereby petitions for leave to intervene in this docket, and states:

1. The FCTA is a non-profit trade association representing the cable telecommunications industry in Florida, including certificated alternative local exchange carriers (ALECs) providing local exchange telecommunications service in Florida. The FCTA's business address is 246 E. 6<sup>th</sup> Avenue, Suite 100, Tallahassee, FL 32303.

2. The name and address of the person authorized to receive all notices, pleadings and other communications in this docket is:

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676  
E-mail: mgross@fcta.com

3. The FCTA represents ALECs who have been certificated by the Commission to provide

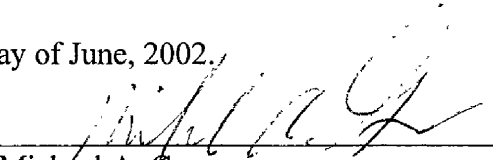
exchange access and local exchange telecommunications services within the State of Florida. Accordingly, the FCTA members are subject to the rules, regulations, and orders of the Commission, and such rules, regulations, and orders impact the FCTA members in the provision of telecommunications services, and their ability to compete. Further, the FCTA members must utilize the operations support systems of incumbent local exchange companies, including Verizon Florida, in order to provide local exchange service in Florida. Consequently, the FCTA's substantial interests will be affected by any decision regarding permanent performance measures for incumbent local exchange companies.

4. As the representative of the interests of its members' certificated telecommunications carriers, the FCTA's intervention is appropriate. The FCTA has actively sought to promote telecommunications competition as a party of record in Commission proceedings for many years and has been granted intervention in numerous dockets which directly impacted its members.

5. The FCTA's intervention will advance judicial efficiency by consolidating the participation of the multiple certificated telecommunications carriers it represents.

WHEREFORE, for the foregoing reasons, the FCTA requests that the Commission grant its Petition for Intervention, and afford the FCTA full party status in this proceeding.

Respectfully submitted this 17<sup>th</sup> day of June, 2002.

  
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Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676