## ORIGINAL

Legal Department

Nancy B. White General Counsel - Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

October 7, 2003

ECEIVED-FPSC PM L:

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

> Re: <u>Docket No. 030851-TP</u>: Implementation of requirements arising from Federal Communications Commission Triennial UNE Review: Local Circuit Switching for Mass Market Customers

Dear Ms. Bayó:

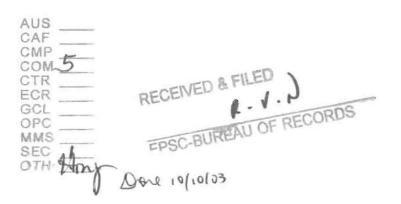
Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Petition to Intervene, which we ask that you file in the captioned docket.

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,

Nancy B. White

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey



DOCUMENT NUMBER-DATE 09738 OCT-78 FPSC-COMMISSION CLERK Lisa A. Sapper AT&T 1200 Peachtree Street, N.E. Suite 8100 Atlanta, GA 30309 Tel. No. (404) 810-7812 Isapper@att.com

Marva Brown Johnson, Esq. KMC Telecom III, LLC 1755 North Brown Road Lawrenceville, GA 30034-8119 marva.johnson@kmctelecom.com

Susan S. Masterton, Esq. Sprint-Florida, Inc. Sprint Communications Co. L.P. 1313 Blair Stone Road P.O. Box 2214 Tallahassee, FL 32316-2214 Tel. No. (850) 599-1560 Fax. No. (850) 878-0777 susan.masterton@mail.sprint.com

BW Mancy

Nancy B. White ( 1/A)

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Implementation of requirements arising ) from Federal Communications ) Commission Triennial UNE Review: ) Local Circuit Switching for Mass Market ) Customers ) Docket No. 030851-TP

Filed: October 7, 2003

## BELLSOUTH TELECOMMUNICATIONS, INC.'S <u>PETITION FOR LEAVE TO INTERVENE</u>

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to

Rule 25-22.039, Florida Administrative Code, hereby requests leave to intervene in this

proceeding, and as grounds therefore states:

1. BellSouth is a telephone company 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. BellSouth's principal place of business in Florida is 150 W. Flagler Street,

Suite 1910, Miami, Florida 33130. Pleadings and process in this matter may be served upon:

Nancy B. White c/o Nancy H. Sims 150 So. Monroe Street, Suite 400 Tallahassee, Florida 32301

3. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of BellSouth and its business operations in the State of Florida.

WHEREFORE, BellSouth respectfully requests that the Commission grant the Company leave to intervene for all legal purposes in this docket.

Respectfully submitted this 7th day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

i

NANCY B. WHITE

NANCY B. WHITE JAMES MEZA III c/o Nancy H. Sims 150 So. Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5558

MEREDITH E. MAYS R. DOUGLAS LACKEY Suite 4300 675 W. Peachtree St., NE Atlanta, GA 30375 (404) 335-0750

507810