# LAW OFFICES Messer, Caparello & Self

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February 22, 2005

### **BY HAND DELIVERY**

Ms. Blanca Bayó, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 041269-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCImetro Access Transmission Services, LLC ("MCI") are an original and fifteen copies of MCI's Petition to Intervene in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours, . Self

FRS/amb Enclosures cc: Parties of Record

DOCUMENT NUMBER-DATE

DOWNTOWN OFFICE, 215 South Monroe Street, Suite 701 • Tallahassee, Fl 32301 • Phone (850) 222-0720 • Fax (850) 2244558 FEB 22 'S NORTHEAST OFFICE, 3116 Capital Circle, NE, Suite 5 • Tallahassee, Fl 32308 • Phone (850) 668-5246 • Fax (850) 668-5613 FPSC - COMMISSION CLERK

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to establish generic docket ) to consider amendments to interconnection ) agreements resulting from changes in law, ) by BellSouth Telecommunications, Inc. )

Docket No. 041269-TP Filed: February 22, 2005

#### MCI'S PETITION TO INTERVENE

MCImetro Access Transmission Services, LLC (MCI), 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. MCI is 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. MCI's principal place of business is 22001 Loudoun County Parkway, Ashburn,

Virginia 20147.

3. Pleadings, orders, notices, and other papers filed or served in this matter should be

served upon:

Donna Canzano McNulty, Esq. MCI 1203 Governors Square Blvd, Suite 201 Tallahassee, FL 32301 donna.mcnulty@mci.com De O'Roark, Esq. MCI 6 Concourse Parkway, Suite 600 Atlanta, GA 30328 <u>de.oroark@mci.com</u>

and

Floyd Self, Esq. Messer, Caparello & Self, P.A. Hand: 215 S. Monroe Street, Suite 701 Tallahassee, FL 32301 Mail: P.O. Box 1876 Tallahassee, FL 32302-1876 <u>fself@lawfla.com</u> 4. MCImetro Access Transmission Services, LLC is authorized by the Florida Public Service Commission to provide local telecommunications services in the State of Florida.

5. In this docket, BellSouth has required that the Commission initiate this proceeding and ultimately approve modifications to existing interconnection agreements. Because MCI has an existing interconnection agreement with BellSouth, the Commission's decision in this docket will directly affect the substantial interests of MCI and its business operations in the state of Florida.

WHEREFORE, MCImetro Access Transmission Services, LLC, respectfully requests that the Commission grant it the leave to intervene for all legal purposes in this docket.

Respectfully submitted this 22<sup>nd</sup> day of February, 2005.

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and

De O'Roark, Esq. MCI 6 Concourse Parkway, Suite 600 Atlanta, GA 30328 (770) 284-5497

Attorneys for MCImetro Access Transmission Services, LLC

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery(\*) and/or U. S. Mail this 22<sup>nd</sup> day of February, 2005.

Adam Teitzman, Esq.\* Office of General Counsel, Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Nancy B. White c/o Nancy H. Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

Michael A. Gross Vice President, Regulatory Affairs & Regulatory Counsel Florida Cable Telecommunications Assoc., Inc. 246 E. 6<sup>th</sup> Avenue Tallahassee, FL 32303

Kenneth A. Hoffman, Esq. Martin P. McDonnell, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302

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