

Charles J. Rehwinkel General Attorney P.O. Box 2214 Tallahassee, FL 32316 Mailstop FLTLH00107 Voice 850 847 0244 Fax 850 599 1458

ON'GINAL

June 12, 1998

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

Re: Docket No. 980671-TL

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of Sprint-Florida, Inc.'s Petition to Intervene.

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

Thank you for your assistance in this matter.

Sincerely,

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AFA _____ Charles J. Rehwinkel

APP _____ CJR/th

CM Man Enclosures

CTR ____ EAG .

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of) proposed numbering plan relief) for the 407 area code) ICE COMMISSION

Filed: June 12, 1998

PETITION TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, Sprint-Florida, Incorporated (Sprint) petitions the Florida Public Service Commission ("FPSC") for leave to intervene in this docket, and says:

1. Sprint is a "telecommunications company" within the meaning of Section 364.02(l2), Florida Statutes (1997), and provides local exchange telecommunications service within the 407 numbering plan area ("NPA") pursuant to a certificate of public convenience and necessity issued by the FPSC.

2. All pleadings, orders, notices, and other papers filed or served in this docket should be served on Sprint the following address:

Charles J. Rehwinkel Sprint-Florida, Incorporated Post Office Box 2214 MS: FLTLHO0107 Tallahassee, Florida 32316

3. Sprint's substantial interests will be affected by the Commission's decision in this case because that decision will determine the manner in which relief will be granted to the existing 407 NPA, which in turn, will affect the operations of Sprint as a local exchange company providing service in the 407 NPA.

4. The issues of disputed facts known to Sprint at this time are the issues

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shown on page 10 of Order No. PSC-98-0767-PCO-TL, issued on June 4, 1998, in this docket. Sprint reserves the right to identify and raise additional disputed issues of material facts as this proceeding progresses.

5. Section 120.57, Florida Statutes, entitles Sprint to the relief requested in this petition.

WHEREFORE, Sprint-Florida, Incorporated respectfully requests that it be allowed to intervene in this docket.

DATED this 12th day of June, 1998.

Charles J. Rehwinkel Sprint-Florida, Incorporated P. 0. Box 2214 MS: FLTLHO0107 Tallahassee, Florida 32316 850/847-0244

CERTIFICATE OF SERVICE DOCKET NO. 980671-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 12th day of June, 1998 to the following:

Will Cox Division of Legal Services Florida Public Service Comm. 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

James T. Schumacher Lynn B. Hall Vista-United Telecommunications Post Office Box 10180 Lake Buena Vista, FL 32830

Angela Green Florida Public Tele. Assoc. 125 S. Gadsden St., #200 Tallahassee, FL 32301-1525

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Lee L. Willis J. Jeffry Wahlen Ausley & McMullen P. O. Box 391 Tallahassee, FL 32302

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