STATE OF SOUTH CAROLINA)
)
(Caption of Case)
)
IN RE:)
)
Application of BellSouth)
Telecommunications, Inc. to)
Provide In-Region InterLATA)
Services Pursuant to Section 271 of the)
Telecommunications Act of 1996)
)
)

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2001 - 209 - C

(Please type or print)
Submitted by: John J. Pringle, Jr.

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition**

☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:**

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
☐ Electric	☐ Affidavit	☐ Letter	☐ Request
☐ Electric/Gas	☐ Agreement	☐ Memorandum	☐ Request for Certification
☐ Electric/Telecommunications	☐ Answer	☐ Motion	☐ Request for Investigation
☐ Electric/Water	☐ Appellate Review	☐ Objection	☐ Resale Agreement
☐ Electric/Water/Telecom.	☐ Application	☐ Petition	☐ Resale Amendment
☐ Electric/Water/Sewer	☐ Brief	☐ Petition for Reconsideration	☐ Reservation Letter
☐ Gas	☐ Certificate	☐ Petition for Rulemaking	☐ Response
☐ Railroad	☐ Comments	☐ Petition for Rule to Show Cause	☐ Response to Discovery
☐ Sewer	☐ Complaint	☒ Petition to Intervene	☐ Return to Petition
☒ Telecommunications	☐ Consent Order	☐ Petition to Intervene Out of Time	☐ Stipulation
☐ Transportation	☐ Discovery	☐ Prefiled Testimony	☐ Subpoena
☐ Water	☐ Exhibit	☐ Promotion	☐ Tariff
☐ Water/Sewer	☐ Expedited Consideration	☐ Proposed Order	☐ Other:
☐ Administrative Matter	☐ Interconnection Agreement	☐ Protest	
☐ Other:	☐ Interconnection Amendment	☐ Publisher's Affidavit	
	☐ Late-Filed Exhibit	☐ Report	

Print Form Reset Form

ELLIS : LAWHORNE

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February 20, 2009

FILED ELECTRONICALLY
The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

RE: Application of BellSouth Telecommunications Inc. to Provide In-Region InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996
Docket No. 2001-209-C

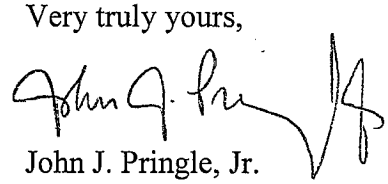
Dear Mr. Terreni:

Enclosed is the **Petition to Intervene** for filing on behalf of the Competitive Carriers of the South, Inc. ("CompSouth") in the above-referenced docket. By copy of this letter, I am serving all parties of record in this proceeding and enclose my certificate of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,



John J. Pringle, Jr.

JJP/cr
cc: Garry Sharp
all parties of record
Enclosures

BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION
DOCKET NO. 2001-209-C

IN RE:	)	
	)	
Application of BellSouth	)	
Telecommunications Inc. to Provide	)	**PETITION TO INTERVENE**
In-Region InterLATA	)	
Services Pursuant to Section 271 of the	)	
Telecommunications Act of 1996	)	

Petitioner Competitive Carriers of the Southeast, Inc. ("CompSouth" or "Petitioner"), by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission (the "Commission"), pursuant to Rule 103-825 of the Commission's Rules, for an order allowing CompSouth to intervene in the above Docket, with full rights to participate as a party of record. In support of its petition, CompSouth would show the Commission the following:

1. CompSouth is an association of competitive local exchange carriers ("CLECs"). CompSouth is comprised of Access Point, Inc., Birch Communications (fka Access Integrated Networks, Inc.), Cavalier Telephone, Cbeyond Communications, Covad Communications Company, Deltacom, Level 3 Communications, Momentum Telecom, Inc., NuVox Communications, Inc., Sprint Nextel, tw telecom, Inc., and XO Communications, Inc.

2. Petitioner has a vital interest in the above-captioned proceeding. The members of CompSouth are customers and competitors of AT&T in South Carolina and across the Southeast.

3. CompSouth's position is set out in its Objection to AT&T's Declaration of a Force Majeure Event filed concurrently with this Petition to Intervene.

4. Petitioner should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.

5. Petitioner's authorized representative in this proceeding is:

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6. CompSouth asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

WHEREFORE, CompSouth prays for the Commission to:

a. Grant this Petition to Intervene and make Petitioner a party of record in Docket No. 2001-2009-C, allowing Petitioner to participate fully and take such positions as it deems advisable; and

b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ELLIS, LAWHORNE & SIMS, P.A.

BY: _____

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Attorneys for CompSouth

February 20, 2009
Columbia, South Carolina

BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION
DOCKET 2001-2009-C

IN RE:	)	
	)	
Application of BellSouth	)	
Telecommunications, Inc. to	)	**CERTIFICATE OF SERVICE**
Provide In-Region InterLATA	)	
Services Pursuant to Section 271 of the	)	
Telecommunications Act of 1996		

This is to certify that I have caused to be served this day, one (1) copy of the **Petition to Intervene** via electronic mail addressed as follows:

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February 20, 2009
Columbia, South Carolina