

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into appropriate methods to compensate carriers for exchange of traffic subject to Section 251 of the Telecommunications Act of 1996.

Docket No. 000079-1158 29 PM 3: 59 Filed: February 29, 2000 RECCASS AND

REPORTING

## <u>TIME WARNER TELECOM OF FLORIDA L.P.'S</u> <u>PETITION FOR LEAVE TO INTERVENE</u>

Pursuant to Rule 25-22.039, Florida Administrative Code, Time Warner Telecom of Florida,

L.P. ("Time Warner"), by and through its undersigned counsel, hereby petitions for leave to intervene

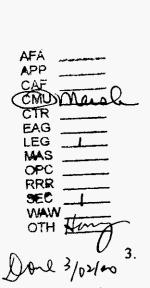
in this docket, and states as follows:

1. The address and telephone number of Time Warner are as follows:

Time Warner Telecom of Florida, L.P. c/o Carolyn Marek 233 Bramerton Court Franklin, Tennessee 37069 (615)376-6404 (615)376-6405 (facsimile)

2. All notices, pleadings, and other documents in this matter should be directed to Time

Warner's legal counsel at the following address:



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#### PETER M. DUNBAR, ESQ.

Florida Bar No. 146594 **KAREN M. CAMECHIS, ESQ.** Florida Bar No. 0898104 PENNINGTON, MOORE, WILKINSON, BELL & DUNBAR, P.A. Post Office Box 10095 (32302) 215 S. Monroe Street, 2nd Floor Tallahassee, Florida 32301 (850) 222-3533 (850) 222-2126 (facsimile) E-mail: <u>Pete@penningtonlawfirm.com</u> E-mail: <u>Karen@penningtonlawfirm.com</u>

The Commission granted Time Warner a certificate of authority in Docket No. 95-0906

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to provide services as an Alternative Local Exchange Company ("ALEC") in Florida. Time Warner is a facilities-based carrier presently providing exchange access and local exchange telecommunications services in Florida. Accordingly, Time Warner is subject to the rules, regulations, and orders of the Commission, and such rules, regulations, and orders impact Time Warner in the provision of telecommunications services in Florida, and Time Warner's ability to compete.

4. Time Warner's interests may or will be substantially and directly affected by the Commission's decision in this docket inasmuch as Time Warner is an ALEC which exchanges traffic with local exchange companies in order to provide local exchange service. The Commission's decision in this generic docket will likely have precedential impact on future decisions of the Commission and, in turn, upon Time Warner. Thus, the interests of Time Warner Telecom may or will be substantially affected by any decision regarding compensation methods for the exchange of traffic.

For the reasons stated above, Time Warner respectfully requests that the Commission grant this <u>Petition for Leave to Intervene</u> and accord Time Warner full party status in this proceeding.

Respectfully submitted this 29th day of February 2000.

PETER M. DUNBAR, ESQ. Fla. Bar No. 146594 KAREN M. CAMECHIS, ESQ. Fla. Bar No. 0898104 Pennington, Moore, Wilkinson, Bell & Dunbar, P.A. Post Office Box 10095 Tallahassee, Florida 32302-2095 (850) 222-3533 (850) 222-2126 (fax)

Counsel for: Time Warner Telecom of Florida, L.P.

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### <u>CERTIFICATE OF SERVICE</u> <u>DOCKET NO. DOCKET 000075-</u>TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Leave to

Intervene has been served by U.S. Mail on this 29th day of February, to the following parties of record:

#### AT&T

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Tracy Hatch 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

BellSouth Telecommunications, Inc. Ms. Nancy B. White c/o Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 310 N. Monroe St. Tallahassee, FL 32301

GTE Florida Incorporated Kimberly Caswell P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

MCI WorldCom Ms. Donna C. McNulty 325 John Knox Road, Suite 105 Tallahassee, FL 32303-4131 MediaOne Florida Telecommunications, Inc. c/o Laura L. Gallagher, P.A. 101 E. College Ave., Suite 302 Tallahassee, FL 32301

Messer Law Firm Floyd Self P.O. Box 1876 Tallahassee, FL 32302

Rutledge Law Firm Kenneth Hoffman/John Ellis P.O. Box 551 Tallahassee, FL 32302-0551

Sprint-Florida, Incorporated Charles J. Rehwinkel/Susan Masterton P.O. Box 2214 MS: FLTLHO0107 Tallahassee, FL 32316-2214

Supra Telecom Mrs. Doris M. Franklin 1311 Executive Center Drive, Suite 200 Tallahassee, FL 32301

KAREN M. CAMECHIS, ESQ.

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