# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION RIGINAL

In re: Investigation into Appropriate	)	Docket No.:	000075-TP
Methods to Compensate Carriers	)	Filed:	February 20, 2001
for Exchange of Traffic Subject to	)		
Section 251 of the Telecommunications	)		
Act of 1996.	)		

# TIME WARNER TELECOM OF FLORIDA, L.P.'S RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES (Nos. 1-2)

Time Warner Telecom of Florida, L.P. ("Time Warner Telecom"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Responses to Staff's First Set of Interrogatories (Nos. 1-2), served by Staff of the Florida Public Service Commission ("Staff") on February-1, 2001.

# INTERROGATORY NO. 1

Please refer to the direct testimony of BellSouth witness David P. Scollard, page 5, beginning at line 13. Witness Scollard contends that ALECs should be required to provide BellSouth with ISP telephone numbers.

a) Do each of the companies sponsoring witness Lee Selwyn's testimony know which numbers it provides that are ISP numbers?

# RESPONSE

Yes, Time Warner Telecom knows which numbers it provides that are ISP numbers, however, the numbers themselves are highly proprietary information.

b) If the response to a) is negative, how would such information be obtained, if the Commission were to require it?

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#### RESPONSE

Time Warner Telecom's response to 1(a) was in the affirmative. Accordingly, this ... question is inapplicable to Time Warner.

# INTERROGATORY No. 2

Please refer to the rebuttal testimony of BellSouth witness William Taylor, page 51, beginning at line 9, where he states that ALECs possibly send a share of the reciprocal compensation revenues with ISPs.

a) Do any of the companies sponsoring witness Lee Selwyn's testimony share reciprocal compensation revenues with ISPs?

## RESPONSE: .

Time Warner Telecom has filed a Notice of Intent to Request Specified Confidential Classification of this Response inasmuch as Time Warner Telecom considers this marketing strategy information to be proprietary and confidential.

b) Do any of the companies sponsoring witness Lee Selwyn's testimony share a lower rate to an ISP for a service than it charges to other non-ISP customers for comparable services?

## RESPONSE:

No, Time Warner Telecom offers similarly situated customers comparable terms and rates on comparable services.

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Respectfully submitted this 20th day of February, 2001.

TIME WARNER TELECOM OF FLORIDA, L.P.

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