BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (SPRINT-FLORIDA TRACK) Docket No.: 000121B-TP Filed: May 6, 2002

TIME WARNER TELECOM OF FLORIDA L.P.'S <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 sent to Time Warner's

legal counsel at the following address :

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>

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3. The Commission granted Time Warner a certificate of authority in Docket No. 95-0906 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, and Time Warner's ability to compete.

4. As an ALEC, Time Warner must utilize the operations support systems of incumbent local exchange companies, including Sprint-Florida, in order to provide local exchange service in Florida. Thus, Time Warner's interests may or will be substantially and directly affected by any decision regarding permanent performance measures for incumbant local exchange companies.

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

Respectfully submitted this 6th day of May, 2002.

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

CERTIFICATE OF SERVICE DOCKET NO. 000121B-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Time Warner

Telecom of Florida, L.P.'s Petition for Leave to Intervene has been served by U.S. Mail

on this 6th day of May, 2002, to the following parties of record:

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Suzanne F. Summerlin 2536 Capital Medical Blvd. Tallahassee, FL 32309

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Z-Tel Communications, Inc. John Rubino/George S. Ford 601 S. Harbour Island Blvd. Tampa, FL 33602-5706

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