BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by AT&T Communications of the Southern States, Inc., TCG South Florida, and MediaOne Florida Telecommunications, Inc. for structural separation of BellSouth Telecommunications, Inc. into two distinct wholesale and retail corporate subsidiaries.

Docket No.: 010345-TP Filed: March 30, 2001

TIME WARNER TELECOM OF FLORIDA L.P.'S PETITION FOR LEAVE TO INTERVENE

Pursuant to Rules 25-22.039 and 28-106.201(2), 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:

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)
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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 in Florida, and Time Warner's ability to compete.

4. Time Warner's interests will be substantially and directly affected by the Commission's decision in this docket inasmuch as Time Warner is a competitor of BellSouth Telecommunications, Inc., in Florida retail markets for the provision of telecommunications services.

For the reasons stated above, Time Warner respectfully requests leave to intervene and full party status in this proceeding.

Respectfully submitted this 30th day of March 2001.

TIME WARNER TELECOM OF FLORIDA, L.P.

PÉTER M. DUNBAR, ESÓ.

Fla./Bar No. 146594

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Counsel for: Time Warner Telecom

CERTIFICATE OF SERVICE DOCKET NO. 010345

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 30th day

of March, 2001, to the following parties of record:

AT&T Ms. Rhonda P. Merritt 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

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

FL. Cable Telecommunications Assoc., Inc. Mr. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

Maxcess, Inc. Ms. Doris Franklin 315 South Calhoun Street, Suite 314 Tallahassee, FL 32301-1837

TCG South Florida Ms. Rhonda P. Merritt c/o AT&T Corp. 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1546

KAREN M. CAMECHÍS, ESQ.