BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth) Telecommunications, Inc.'s entry) into interLATA services pursuant) to Section 271 fo the Federal) Telecommunications Act of 1996.)

Docket No. 960786-TP

Filed: June 19, 2001

REQUEST FOR REPRESENTATION BY A QUALIFIED REPRESENTATIVE

Time Warner Telecom of Florida, L.P. ("Time Warner"), through its undersigned counsel,

submits this Request for Representation by a Qualified Representative pursuant to Rule 28-106.106,

Florida Administrative Code. In support thereof, Time Warner states as follows:

1. Time Warner seeks leave of the presiding officer for the following individual to

appear on behalf of Time Warner as a qualified representative in this proceeding:

Henry C. Campen, Jr., Esq. Parker, Poe, Adams & Bernstein, LLP P.O. Box 389 First Union Capital Center 150 Fayetteville Street Mall, Suite 1400 Raleigh, N.C. 27602-0389 (919) 890-4145 (919) 890-4564 (fax)

2. Time Warner is aware of the services Mr. Campen can provide and is aware that Time Warner may elect to be represented solely by "counsel" as that term is defined in Rule 28-106.106(1). Indeed, Time Warner is currently represented by attorneys who are members of The Florida Bar and will retain such counsel throughout this proceeding.

3. Time Warner respectfully submits that Mr. Campen possesses the necessary

qualifications to responsibly represent Time Warner's interests in this matter. In that regard,

Mr. Campen's qualifications are set forth in the attached affidavit.

DOCUMENT NUMBER-DATE 07629 JUN 195 FPSC-RECORDS/REPORTING 4. Mr. Campen has practiced telecommunications law extensively before this Commission as well as the North Carolina regulatory authority and other states' utility regulatory agencies or authorities. In addition, Mr. Campen has knowledge of the following: the Florida Rules of Civil Procedure relating to the discovery in an administrative proceeding; the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; the factual and legal issues in this matter; and the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.

WHEREFORE, for the foregoing reasons, Time Warner requests that Mr. Campen be permitted to appear as a qualified representative on behalf of Time Warner.

RESPECTFULLY SUBMITTED this 19th day of June, 2001.

TIME WARNER TELECOM OF FLORIDA, L.P.

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

BEFORE THE FLORIDA PUBLIC SERVIE COMMISSION

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996. Docket No. 960786-TL

Filed:

AFFIDAVIT OF HENRY C. CAMPEN, JR.

STATE OF NORTH CAROLINA COUNTY OF WAKE

I, Henry C. Campen, Jr., being first duly sworn, do hereby depose and state as follows:

1. I am an attorney employed by Parker, Poe, Adams & Bernstein, L.L.P., which is

located at 150 Fayetteville Street Mall, Suite 1400, Raleigh, North Carolina 27602-0389.

2. I am a member in good standing of the State Bar of North Carolina, Bar No.

13446, and am seeking designation as a qualified representative of Time Warner Telecom of Florida, L.P., pursuant to Rule 28-106.106, Florida Administrative Code.

3. I have represented telecommunications clients before this and other regulatory agencies in numerous regulatory proceedings.

4. I am familiar with jurisdictional issues, the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure related to discovery in administrative proceedings,

the Florida Administrative Code, and the Florida Rules of Evidence including the concept of hearsay in administrative proceedings.

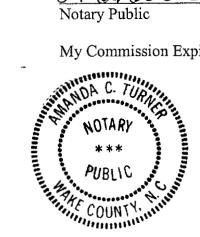
5. I have or will acquire knowledge of the factual and legal issues in this matter, and have complied with, and will continue to comply with, the Standards of Conduct for Qualified Representatives set forth in Rule 28-106.107, Florida Administrative Code.

I declare that the foregoing is true and correct based on my knowledge, information and belief.

Henry C. Campen

Subscribed and sworn to before me this // day of June, 2001.

Amanda C. June Notary Public My Commission Expires: 6/26/05



CERTIFICATE OF SERVICE

DOCKET NO. 960786-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing REQUEST FOR

REPRESENTATION BY A QUALIFIED REPRESENTATIVE has been served by U.S.

Mail on this 19th day of June, 2001, to the following parties of record:

AT&T Communications of the Southern States, Inc. Ms. Rhonda P. Merritt 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

American Communications Services, Inc. James Falvey 131 National Business Parkway Annapolis Junction, MD 20701

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

BellSouth Telecommunications, Inc. (Atl) Nancy White/Lisa S. Foshee 675 W. Peachtree St., #4300 Atlanta, GA 30375

Birch Ms. Rose M. Mulvany 2020 Baltimore Avenue Kansas City, MO 64108-1914

CWA Alan H. Keith 2180 West State Road 434, Suite 1168 Orange Park, FL 32779 CWA Kenneth Ruth 2180 West State Road 434 Longwood, FL 32779

CompTel Terry Monroe/Genevieve Morelli 1900 M Street, NW, Suite 800 Washington, DC 20036

Covad Communications Company Ms. Catherine F. Boone 10 Glenlake Parkway, Suite 650 Altanta, GA 30328-3495

Cox Communications (VA) Jill Butler 4585 Village Ave. Norfolk, VA 23502

DES Long Distance Linda Williams P. O. Box 1585 Destin, FL 32540-1585

Davel Communications Group, Inc. Lisa Bilchik 10120 Windhorst Rd. Tampa, FL 33619 DeltaCom, Inc. Nanette Edwards 700 Boulevard South # 101 Huntsville, AL 35802

Executive Office of the Governor Office of Planning and Budget General Government Unit Tallahassee, FL 32399-0001

Federal Communications Commission Janice Miles 1919 M St., NW, #544 Washington, DC 20554

Fisher Law Firm Glenn Richards/Jaqualin Peterson 2001 Pennsylvania Ave. NW Washington, DC 20006-1851

Florida Cable Telecommunications Assoc., Inc. Michael Gross/Charles Dudley 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Vicki Kaufman 117 South Gadsden Street Tallahassee, FL 32301

Florida Digital Network, Inc. Matthew Feil, Esq. 390 North Orange Ave., Suite 2000 Orlando, FL 32801

Florida Electric Cooperatives Assc., Inc. Michelle Hershel 2916 Apalachee Parkway Tallahassee, FL 32301 Florida Public Telecommunications Assoc. Angela Green, General Counsel 125 S. Gadsden St., #200 Tallahassee, FL 32301-1525

Florida Senate Committee on Regulated Industries John Guthrie 404 S. Monroe Street Tallahassee, FL 32399-1100

Hopping Law Firm Richard Melson P.O. Box 6526 Tallahassee, FL 32314

IDS Telecom LLC 1525 N.W. 167th Street, 2nd Floor Miami, FL 33169-5143

ITC^DeltaCom Ms. Nanette S. Edwards 4092 South Memorial Parkway Huntsville, AL 35802-4343

IXC Communications Services, Inc. Director of Regulatory Affairs 1122 Capital of Texas Highway South Austin, TX 78746

Intermedia Communications, Inc. Mr. Scott Sapperstein One Intermedia Way Tampa, FL 33647-1752

KMC Telecom Inc. Mr. John D. McLaughlin, Jr. 1755 North Brown Road Lawrenceville, GA 30043-8119

Katz, Kutter Law Firm Charles Pellegrini/Patrick Wiggins 12th Floor Tallahassee, FL 32301 Kelly Drye Law Firm Andrew Klein 1200 19th St. NW, #500 Washington, DC 20036

Kentucky Public Service Commission Deborah Eversole, General Counsel P. O. Box 615 Frankfort, KY 40602

Knowles Law Firm John Marks, III 215 S. Monroe St., #130 Tallahassee, FL 32301

LDDS Communications, Inc. Brian Sulmonetti 1515 S. Federal Hwy., #400 Boca Raton, FL 33432-7404

Landers Law Firm Scheffel Wright P.O. Box 271 Tallahassee, FL 32302

MCI WorldCom Network Services, Inc. Ms. Donna C. McNulty 325 John Knox Road, Suite 105 Tallahassee, FL 32303-4131

MGC Communications, Inc. Marilyn H. Ash 3301 North Buffalo Drive Las Vegas, NV 89129

McWhirter Law Firm Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

Messer Law Firm Floyd Self P.O. Box 1876 Tallahassee, FL 32302 Metropolitan Fiber Systems of Florida, Inc. Mr. Brian Sulmonetti 1515 South Federal Highway, Suite 400 Boca Raton, FL 33432-7404

Network Access Solutions Corporation 100 Carpenter Drive, Suite 206 Sterling, VA 20164

NewSouth Communications Lori Reese Two North Main Street Greenville, SC 29609

Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., #812 Tallahassee, FL 32399-1400

Parker Law Firm Henry Campen P.O. Box 389 Raleigh, NC 27602-0389

Qcc Inc. Janet Cinelli 8829 Bond St. Overland Park, KS 66214

Rhythms Links Inc. 6933 South Revere Parkway, Suite 100 Englewood, CO 80112

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

Shook, Hardy & Bacon LLP Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington, DC 20005-2004 South Carolina Public Service Commission Research Dept./Vivian Dowdy P.O. Drawer 11649 Columbia, SC 29211

Sprint Communications Company Limited Partnership Benjamin Fincher 3100 Cumberland Circle Atlanta, GA 30339-5940

Suzanne F. Summerlin, Esq. 1311-B Paul Russell Rd, Ste 201 Tallahassee, FL 32301

Swidler & Berlin Michael Sloan 3000 K St. NW, #300 Washington, DC 20007-5116

TCG America, Inc. Ms. Jodie Donovan 1 Teleport Drive, Suite 301 Staten Island, NY 10311-

Time Warner Telecom Ms. Carolyn Marek Regulatory Affairs, Southeast Region 233 Bramerton Court Franklin, TN 37069

Touch 1 Communications Charlene Perry P.O. Drawer 10751 Atmore, AL 36504-5751

U.S. Department of Justice/Telecom Task Force Anu Seam Antitrust Division Washington, DC 20530

for

US LEC of Florida Inc. 6801 Morrison Blvd. Charlotte, NC 28211-3599

Utilities and Telecommunications (State House) Patrick L. "Booter" Imhof 410 House Office Bldg. Tallahassee, FL 32399

Mal T. H

KAREN M. CAMECHIS