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May 1, 2006

Ms. Blanca Bayo, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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COMMISSION CLERK

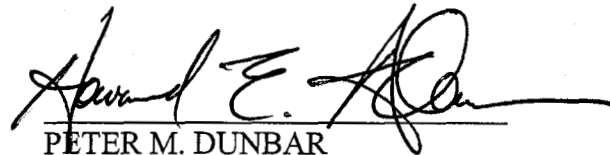
RE: Request for Petition to Intervene Regarding Docket No. 060308-TP

Dear Ms. Bayo:

Enclosed are the original and seven copies for petition to intervene regarding joint application for approval of indirect transfer of control of facilities relating to merger of AT&T, Inc. and BellSouth Corporation.

Copies have been served to the parties shown on the attached Certificate of Service

Respectfully Submitted.



PETER M. DUNBAR
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HOWARD E. ADAMS
Florida Bar Number 0322210
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Attorneys for Time Warner Telecom
of Florida, LP

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SGA _____ Enclosure

SEC 1 Cc: Carolyn Marek, Time Warner Telecom of Florida, L.P.

HEA/bja

OTH *Kum P* Path: G:\Jodi\Gene\Time Warner\Petition to Intervene 060308-TP

DOCUMENT NUMBER-DATE
03842 MAY-1 06
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Joint Application for Approval of
Indirect Transfer of Control of Facilities
Relating to Merger of AT&T Inc. and
BellSouth Corporation

DOCKET NO. 060308-TP

Dated: May 1, 2006

PETITION TO INTERVENE OF
TIME WARNER TELECOM OF FLORIDA, L.P.

COMES NOW Time Warner Telecom of Florida, L.P. ("TWTC") and, pursuant to Rule 25-22.039, Florida Administrative Code of the Florida Public Service Commission (the "Commission"), hereby submits its Petition to Intervene ("Petition") and participate as a full party of record in the above-captioned docket (the "Docket"). In support of its Petition, TWTC states as follows:

1.

The Commission has issued TWTC a certificate of authority to provide competitive local exchange services in Florida and the Commission has also issued TWTC a certificate for interexchange service in Florida.

2.

TWTC provides facilities-based local and resold interexchange telecommunications services to business customers in the State of Florida.

3.

To provide telecommunications service, TWTC has entered into interconnection agreements with BellSouth Telecommunications, Inc. ("BellSouth"), which were approved by the Commission in Docket Nos. 97-1536, 02-0192, 04-0097, and 05-0440.

DOCUMENT NUMBER-DATE

03842 MAY-1 06

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4.

As provider of local telecommunications service in the State of Florida, and through its interconnection arrangements and procurement of interconnection services and related facilities from BellSouth, TWTC has a substantial interest in and rights that would be affected by the Commission's decision in this matter, including assurance of continued traffic exchange, access to interconnection and network elements at just and reasonable rates, terms and conditions, including special access, with adequate service quality metrics and performance incentives, and to regulatory dispute resolution processes, as well as parity in access to buildings, pole attachments, ducts, conduit, rights-of-way, and other facilities and property interests.

5.

The Commission has jurisdiction regarding this matter, including the requirement for any entity or entities seeking to acquire ownership or control to first seek and obtain appropriate Commission approval pursuant to Section 364.33, Florida Statute (2005).

6.

The names and addresses of the attorneys representing TWTC in this proceeding who are authorized to accept service of filing on behalf of TWTC are:

Howard E. Adams, Esquire
Peter M. Dunbar, Esquire
Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.
215 South Monroe Street, 2nd Floor
Tallahassee, FL 32301-1839
Telephone: (850) 222-3533
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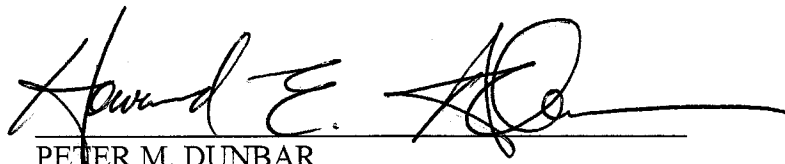
7.

TWTC requests intervention as a full party of record, including without limitation, the right to present testimony and exhibits and to cross-examine witnesses. TWTC's rights and

interests in this matter will not adequately be represented by any other party and TWTC's participation herein will not unduly delay this proceeding.

WHEREFORE, Time Warner Telecom of Florida, L.P. respectfully requests that the Commission enter an order granting this Petition and allowing TWTC to become a full party of record in the above-captioned Docket.

Respectfully submitted this 1st day of May 2006.



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Attorneys for Time Warner Telecom of Florida, LP

Path: G/Gene/Jodi/Time Warner/Petition to Intervene 060308-TP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition to Intervene of Time Warner Telecom of Florida, L.P. was served via First Class U.S. mail this 1st day of May, 2006, to the following:

AT&T Communications of the Southern States, LLC
Tracey Hatch
101 North Monroe Street, Suite 700
Tallahassee, FL 32301

AT&T Inc. (06)
Martin E. Grambow/David Eppsteiner
175 East Houston
San Antonio, TX 78205-2233

AT&T Long Distance
Ms. Amy Berlin
5850 West Las Positas Blvd.
Pleasanton, CA 94558-8522

BellSouth Long Distance, Inc.
Ms. Mary Jean Dennis
North Terraces Building
400 Perimeter Center Terrace, #400
Atlanta, GA 30346-1231

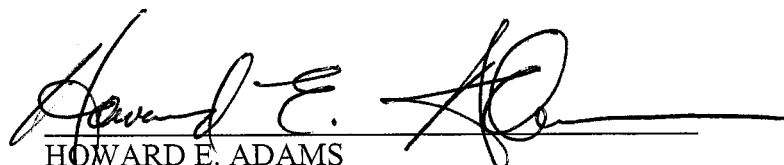
BellSouth Telecommunications, Inc. (061)
J. Merza/L. Foshee/J. Harralson
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Holland & Knight LLP (06)
D. Bruce May, Jr.
315 South Calhoun Street
Tallahassee, FL 32301

Kellogg Huber Law Firm (06)
Kellogg Huber Hansen Todd Evans & Figel
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SBC Long Distance East
Mr. Arthur H. Paquette
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New Haven, CT 06510-1719

TCG
Mr. Brian Musselwhite
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