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REPLY TO: P.O. BOX 10095 TALLAHASSEE, FL 32302-2095

November 1, 1996

Ms. Blanca Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Generic Investigation into

Permanent Number Portability

Docket No. 960100-TP

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen copies of Time Warner AxS of Florida, L.P. d/b/a Time Warner Communications and Digital Media Partners' Petition for Leave to Intervene for the above-referenced docket. Please date-stamp the copy of this letter to indicate that the original was filed and return to me.

If you have any questions regarding this matter, please feel free to contact me.

Respectfully,

PENNINGTON, CULPEPPER, MOORE, WILKINSON, DUNBAR & DUNLAP, P.A.

Robert S. Cohen

RSC/dat Enclosure

cc: All Parties of Record (w/ enclosure)

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Generic Investigation into Permanent Number Portability

Docket No. 960100-TP Filed: October 31, 1996

PETITION FOR LEAVE TO INTERVENE BY TIME WARNER AXS OF FLORIDA, L.P. d/b/a TIME WARNER COMMUNICATIONS AND DIGITAL MEDIA PARTNERS



Time Warner AxS of Florida, L.P. d/b/a Time Warner Communications and Digital Media Partners (hereinafter referred to collectively as "Time Warner Communications"), pursuant to Rule 25-22.039, Florida Administrative Code, and by and through their undersigned counsel, do hereby jointly file their Petition for Leave to Intervene and, in support hereof, state the following:

- 1. Both Time Warner Communications entities are certificated as Alternative Local Exchange Companies in Florida. The address for Time Warner AxS of Florida, L.P. d/b/a Time Warner Communications is 2251 Lucien Way, Suite 320, Maitland, Florida 32751. The address for Digital Media Partners is 2600 McCormick Drive, Suite 255, Clearwater, Florida 34619. Petitioners' address for purposes of these proceedings is that of their undersigned attorneys.
- 2. This docket concerns Service Provider Number Portability. As alternative local exchange companies, Time Warner Communications' substantial interests will specifically be affected by decisions made by the Commission in this proceeding.
- 3. Service Provider Number Portability ("SPNP") is essential to enabling Time Warner Communications to compete in the local exchange market. Without SPNP, potential customers might not be willing to switch from their existing local service provider

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to Time Warner Communications due to the inconvenience of having to change telephone numbers. Therefore, SPNP is required in order for local competition to thrive.

- 4. At present, the available methods used to provide temporary number portability have severe limitations. Time Warner Communications has a substantial interest in having a permanent solution implemented at minimal cost and a fair price.
- 5. Time Warner Communications has participated in all of the subcommittees in the number portability standards group.
- 6. The names and addresses of the persons to whom copies of all correspondence, notices, orders and other documents in this proceeding should be sent are as follows:

Peter M. Dunbar, Esq. Robert S. Cohen, Esq. Pennington, Culpepper, Moore, Wilkinson, Dunbar & Dunlap, P.A. Post Office Box 10095 Tallahassee, Florida 32302 Sue E. Weiske, Esquire Time Warner Communications 160 Inverness Drive West 3rd Floor North Englewood, Colorado 80112

Ms. Jill Butler Florida Regulatory Director Time Warner Communications 2773 Red Maple Ridge Tallahassee, Florida 32301

WHEREFORE, Petitioner, Time Warner Communications respectfully requests that the Florida Public Service Commission enter an order approving their Petition to Intervene.

RESPECTFULLY SUBMITTED this 5th day of November, 1996.

PETER M. DUNBAR FLA. BAR NO. 146594 ROBERT S. COHEN FLA. BAR NO. 347353

Pennington, Culpepper, Moore, Wilkinson, Dunbar & Dunlap, P.A. Post Office Box 10095 Tallahassee, Florida 32302-2095 (904) 222-3533

Counsel for: Time Warner AxS of Florida, L.P. and Digital Media Partners

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a true copy of the foregoing has been sent by U. S.

Mail to the parties on the attached list this 5th day of November, 1996.

ROBERT S. COHEN

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