

PENNINGTON, MOORE, WILKINSON & DUNBAR, P.A.
ATTORNEYS AT LAW

ORIGINAL
FILE COPY

BARBARA D. AUGER
ROBERT CINTRON, JR.
ROBERT S. COHEN
PETER M. DUNBAR
MARTHA J. EDENFIELD
JOHN T. LEADBEATER
DAVID K. MINACCI
(Also admitted in Georgia)
EDGAR M. MOORE

E. MURRAY MOORE, JR.
JOHN C. PELHAM
CARL R. PENNINGTON, JR., P.A.
C. EDWIN RUDE, JR.
GARY A. SHIPMAN
CYNTHIA S. TUNNICLIFF
WILLIAM E. WHITNEY
BEN H. WILKINSON
CATHI C. WILKINSON

OF COUNSEL
HERBERT F. CLARK
(Admitted in New Jersey, New York & Wisconsin Only)
R. STUART HUFF, P.A.
Coral Gables, Florida
CHRISTOPHER W. KANAGA
(Admitted in Massachusetts & Colorado Only)
SCOTT MADDOX
WILLIAM VANDERCREEK
(Admitted in Texas & Iowa Only)

215 SOUTH MONROE STREET
2ND FLOOR
TALLAHASSEE, FLORIDA 32301

(904) 222-3533
FAX (904) 222-2126
E-Mail Phlaw@Supernet.net

SPECIAL CONSULTANTS
RANDY MILLER*
DAVID L. SWAFFORD*
*NOT A MEMBER OF THE FLORIDA BAR

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

August 6, 1997

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

via Hand Delivery

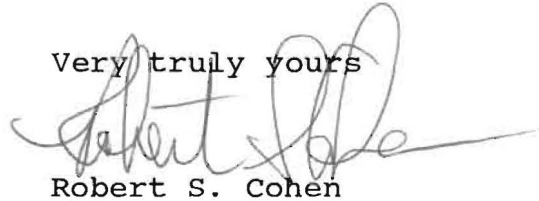
Re: In Re: Consideration of BellSouth
Telecommunications, Inc.'s entry into
InterLATA services pursuant to Section
271 of the Federal Telecommunications
Act of 1996; Docket No. 960786-TL

Dear Ms. Bayo:

Enclosed please find for filing an original and fifteen copies of Time Warner AxS of Florida, L.P. d/b/a Time Warner Communications and Digital Media Partners' Response and Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories. You will also find a copy of this letter enclosed. 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.

Very truly yours



Robert S. Cohen

- ACK
- AFA
- APP
- CAF
- CMU *Queer*
- CTR enclosure
- EAG
- LEG *2*
- LIN *5*
- OPC
- RCH
- SEC *1*
- WAS
- OTH

RECEIVED & FILED
AUG 6 1997
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE
08003 AUG-6 97
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE 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: August 6, 1997**

NOTICE OF SERVICE OF ANSWERS AND OBJECTIONS TO INTERROGATORIES

Time Warner AxS of Florida, L.P. d/b/a Time Warner Communications and Digital Media Partners, by and through their undersigned attorneys, hereby provide notice of the service of its answers and objections to the First Set of Interrogatories from BellSouth Telecommunications, Inc., numbered 1 through 4.

RESPECTFULLY SUBMITTED this 6th day of August, 1997.



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

Pennington, Moore,
Wilkinson & Dunbar, 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

DOCUMENT NUMBER-DATE
08003 AUG-6 97
FPSC-RECORDS/REPORTING

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 6th day of August, 1997.

A handwritten signature in black ink, appearing to read "Robert S. Cohen", written over a horizontal line.

ROBERT S. COHEN

BEFORE THE FLORIDA PUBLIC SERVICE 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: August 6, 1997

**TIME WARNER AXS OF FLORIDA, L.P. d/b/a TIME WARNER
COMMUNICATIONS AND DIGITAL MEDIA PARTNERS'
RESPONSE AND OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS,
INC.'S FIRST SET OF INTERROGATORIES**

Time Warner AxS of Florida, L.P. d/b/a Time Warner Communications and Digital Media Partners (hereinafter collectively referred to as "Time Warner Communications"), by and through their undersigned attorneys, hereby submit the following responses and objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories to Time Warner Communications.

1. If Time Warner is providing telephone exchange service to residential subscribers other than through resale of BellSouth services, identify:

(a) for each month to date in 1997, the number of residential subscribers and the number of subscriber lines by city in Florida, separately identifying the number of subscribers and line for which Time Warner charges a fee and those for which it does not;

(b) for each month to date in 1997, total monthly billings for residential service;

(c) the network arrangements for providing residential telephone exchange service, separately identifying network

arrangements where they differ;

(d) all network facilities that are used to provide residential telephone exchange service, including whether each facility is owned, leased or purchased.

RESPONSE: Not applicable.

2. If Time Warner is providing telephone exchange service to business subscribers other than through resale of BellSouth services, identify:

(a) for each month to date in 1997, the number of business subscribers and the number of subscriber lines by city in Florida separately identifying the number of subscribers and lines for which Time Warner charges a fee and those for which it does not;

(b) for each month to date in 1997, total monthly billings for business service;

(c) separately the number of customers, lines and billings in multiple-family dwelling units and in single-family;

(d) the network arrangements for providing business telephone exchange service, separately identifying network arrangements where they differ;

(e) all network facilities that are used to provide business telephone exchange service, including whether each facility is owned, leased or purchased.

RESPONSE AND OBJECTION: Time Warner Communications objects to this interrogatory to the extent that the information requested

contains or constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is confidential but not subject to the "trade secrets" privilege, Time Warner Communications will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

Additionally, Time Warner Communications objects to providing any of this information to the extent that such information is already in the public records of the Florida Public Service Commission.

3. If Time Warner provides residential telephone exchange service through resale of BellSouth services, identify:

- (a) for each month to date in 1997, the number of subscribers, the number of resold line by city in Florida separately identifying the number of subscribers and lines for which Time Warner charges a fee and those for which it does not;
- (b) for each month to date in 1997, total monthly billings;
- (c) list all services and features resold.

RESPONSE: Not applicable.

4. If Time Warner provides business telephone exchange service through resale of BellSouth services, identify:

- (a) for each month to date in 1997, the number of

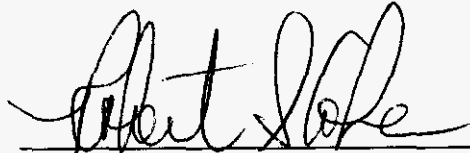
subscribers, the number of resold lines by city in Florida separately identifying the number of subscribers and lines for which Time Warner charges a fee and those for which it does not;

(b) for each month to date in 1997, total monthly billings;

(c) list all services and features resold.

RESPONSE: Not applicable.

RESPECTFULLY SUBMITTED this 6th day of August, 1997.



PETER M. DUNBAR

FLA. BAR NO. 146594

ROBERT S. COHEN

FLA. BAR NO. 347353

Pennington, Moore,
Wilkinson, & Dunbar, 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 6th day of August, 1997.



ROBERT S. COHEN

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

Mr. Brian Sulmonetti
LDDS WorldCom Communications
Suite 400
1515 South Federal Highway
Boca Raton, Florida 33432

Tom Bond, Esquire
MCI Telecommunications Corp.
780 Johnson Ferry Road, Suite 700
Atlanta, Georgia 30342

Jeffrey J. Walker
Regulatory Counsel
Preferred Carrier Services, Inc.
1425 Greenway Drive
Suite 210
Irving, Texas 75038

Richard M. Rindler
Swidler & Berlin, Chartered
3000 K Street, Northwest
Suite 300
Washington, D.C. 20007

Patricia Kurlin
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309

Paul Kouroupas
TCG - Washington
2 Lafayette Center
1133 Twenty First Street, Northwest
Suite 400
Washington, D.C. 20036

Nancy B. White
BellSouth Telecommunications, Inc.
Museum Tower Building
Suite 1910
150 West Flagler Street
Miami, Florida 33130

Floyd R. Self
Messer, Caparello, Madsen,
Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32301

Richard D. Melson
Hopping Green Sams & Smith
Post Office Box 6526
123 South Calhoun
Tallahassee, Florida 32314

Andrew O. Isar
Director, Industry Relations
Telecommunications Resellers
Association
Post Office Box 2461
4312 - 92nd Avenue, Northwest
Gig Harbor, WA 98335-4461

Patrick K. Wiggins
Donna L. Canzano
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
501 East Tennessee, Suite B
Tallahassee, Florida 32302

Kenneth A. Hoffman
William B. Willingham
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
Post Office Box 551
215 South Monroe Street
Suite 420
Tallahassee, Florida 32302

Robert G. Beatty
J. Phillip Carver
c/o Nancy H. Sims
150 South Monroe Street
Room 400
Tallahassee, Florida 32301

Charles J. Beck, Esquire
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Tallahassee, Florida 32301

Tracy Hatch, Esquire
Marsha Rule, Esquire
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, Florida 32301

Sue E. Weiske
Time Warner Communications
160 Inverness Drive West
3rd Floor North
Englewood, Colorado 80112

Laura L. Wilson
Charles F. Dudley
Florida Cable Telecommunications
Association
310 North Monroe Street
Tallahassee, Florida 32301

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs,
Odom & Ervin
Post Office Box 1170
305 South Gadsden
Tallahassee, Florida 32302

Benjamin W. Fincher
3065 Cumberland Circle
Atlanta, Georgia 30339

Nancy Sims
Southern Bell Telephone Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32302-1876

James C. Falvey
American Communications Services, Inc.
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

Monica Barrone, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850