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March 9, 1998

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

via Hand Delivery

RECEIVED-FPSC
99 MAR 18 AM 9:56
RECORDS AND
REPORTING

Re: In Re: Undocketed - Review of Regulated
Utilities' Year 2000 Preparation and
Readiness (Telecommunications)

Dear Ms. Bayo:

As per the Notice of Staff Workshop, issued March 5, 1999, attached are Time Warner AxS of Florida, L.P.'s written responses to the questions attached to the Notice and seven copies of the same. You will also find a copy of this letter enclosed. Please date-stamp this copy to indicate that the original was received and return the copy to me.

If you have any questions regarding this matter, please feel free to contact me. Thank you for your assistance in processing this filing.

Respectfully,

Barbara D. Auger / Karen Betts
Barbara D. Auger

BDA/kab

Enclosures: As noted

DOCUMENT NUMBER-DATE

03554 MAR 18 98

FPSC-RECORDS/REPORTING

**Florida Public Service Commission
Year 200 Readiness Workshop
Questions for ALL Local Exchange Companies,
All Alternative Local Exchange Companies,
And ALL Interexchange Companies**

March 19, 1999 – 9:30 a.m.
Florida Public Service Commission
Betty Easley Conference Center, Room 152
4075 Esplanada Way
Tallahassee, Florida

1. What is the status of your company's Year 2000 plans and preparations? Please report your company's overall percentage of completion toward being fully Year 2000 compliant.

Time Warner Telecom has developed, and is executing, a Year 2000 business plan. The Company Year 2000 project office is using this plan as a guide in ensuring senior management is aware of the potential impact the Year 2000 might have on systems and software. The business plan covers all aspects of the Time Warner Telecom's Year 2000 activities up to and including contingency plans and a complete review of all year 2000 activities. Time Warner Telecom is over 90% complete with our year 2000 readiness plan.

2. What specific timetables and milestones have you identified to prepare for Year 2000? For each timetable and milestone, please report the following: (1) the percentage completed and expected full-completion date; (2) the specific tasks remaining to be completed; and (3) any specific problems anticipated.

Mile Stone	Completion Date
Awareness	2Q98
Inventory	4Q98
Assessment	4Q98
Remediation	3Q99
Testing	3Q99
Implementation	3Q99
Contingency Plans	3Q99

Also, see responses to questions 3, 4, 5, 6, 7, 11, and 14 below.

DOCUMENT NUMBER-DATE

03554 MAR 18 99

3. What is the status of the inventory phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.

Time Warner Telecom has completed the inventory phase of our Y2K project plan.

4. What is the status of the assessment phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.

The Company has developed a Year 2000 action plan to address identification and assessment of potential Year 2000 issues, remediation and testing. The Company has completed the first and second phases of this action plan. The first phase involved making the Company's internal organizations aware of Year 2000 issues and assigning responsibility internally for the Year 2000 readiness program. The second phase involved an inventory and review of software and equipment used in the Company's operations in order to determine the Year 2000 readiness of that software and equipment. The Company has sent out information requests to interconnecting carries and service providers for their Year 2000 readiness. Most of these companies have responded to our request for information. The Y2K program office completed the inventory and assessment of the equipment and systems that the Company views as most critical in 1998. The Company completed the balance of the assessment during the 1Q99.

5. Which of your company's hardware and software systems, such as billing, administrative, customer service, infrastructure, and operational support systems, do you consider critical? For each such system, what functions (in whole or part) are done via mainframe computers and which functions electronically interface with PC-based computers? How are these systems being remediated and tested? What problems have been identified that require additional work to make them Year 2000 compliant? Please report estimated completion dates for each problem identified.

Time Warner Telecom has determined the hardware and software that comprises its telephony networks to be critical to our company. In the course of the assessment process the Company has determined that approximately 90% of the equipment comprising its telephony networks depends on software or firmware that is already represented by its vendor to be Year 2000 ready. The Company is almost finished conducting its own validation testing of that equipment to verify the vendor's representations. The company has successfully completed validation

testing of its telephony switches and has successfully completed testing of all but one piece of transport network equipment. We should complete our validation testing of this one remaining piece of transport network equipment by April 1, 1999.

6. What is the status of the remediation or renovation phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.

Time Warner Telecom purchases most of the applications it uses from commercial sources. Therefore, the Company has very few applications that require remediation. Time Warner Telecom is remediating 12 application. The Company should complete the remediation and testing of these applications by July 1999. We have not identified any problems at this time.

7. What is the status of the testing (both unit and system) phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified. What tests are being done or will be done on network elements and customer-affecting systems? Please describe your company's testing process, including its approach and steps.

Time Warner Telecom will complete its unit testing early 2Q99. The string testing will be completed by early 3Q99. Time Warner Telecom uses the Bellcore GR-2945-CORE (our company Y2K standard) document to guide us in the testing. No Y2K problems have been found at this time.

8. Please describe your company's plans to address interoperability issues with other domestic carriers, such as LECs, IXCs, ALECs, CAPs, and wireless providers, and with interconnected networks and outside systems. Please describe the status of such plans and related discussions, including percentage of completion.

Time Warner Telecom will be performing string testing that will include other LECs, IXCs, etc. These tests will primarily run in early 3Q99. However, some testing with these domestic carriers will begin next month.

9. What network inter-operability testing has your company conducted or will your company conduct? Is your company working with ATIS and NRIC to perform network inter-operability test? Please report the following concerning operability testing: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.

Time Warner Telecom expects to participate in network inter-operability testing during the 2Q99 and 3Q99. The company will be working with ATIS and Teleco Forum 2000 on the testing they have performed and hope to be able to participate with these groups on future inter-operability tests.

10. What is your company doing to avoid network failures that could arise due to non-compliant network providers? What safeguards are being taken? What communications channels have been opened with other network providers?

Time Warner Telecom is testing all of its critical systems, the telephone switches and network transport equipment to ensure they are ready for the year 2000. We are reviewing our contingency plans to ensure all appropriate safeguards are in place. We have been in communication with all of our service providers to ascertain their Y2K readiness.

11. Please describe your company's efforts to work with suppliers of your company's critical hardware and software systems to ensure that each supplier's equipment is Year 2000 compliant. Have you inventoried supplier and third-party products? Have you established compliance standards? What tests (unit and system) remain to be completed to verify that supplier's products are Year 2000 compliant, and when will they be completed? Please describe any contingency plans your company has developed to address the situation where a supplier's product is found to be non-compliant?

Time Warner Telecom's critical hardware and software supplier is Lucent Technologies. We have inventoried all of this equipment and have completed testing of the 5ESS switch and all but 1 piece of the network transport equipment. Lucent Technologies has provided Time Warner Telecom with documentation stating that all equipment used within our company is running Y2K ready at this time. Time Warner Telecom uses Bellcore's GR-2945-CORE as its Y2K standard. GR-2945-CORE is a restricted subset of the ISO 8601 standard. Lucent Technologies also uses GR-2945-CORE as their Y2K standard.

12. What efforts is your company making to contact and educate critical customers to ensure that their telecommunications services and customer premises equipment (CPE) are Year 2000 compliant? What tests are being conducted or can be conducted by a customer to test its equipment?

The Company's exposure to potential Year 2000 problems exists in two general areas: technological operations in the sole control of the Company, and technological operations dependent in some way on one or more third parties. The majority of the Company's exposure to potential Year 2000 problems is in the latter area, where the situation is much less within the Company's ability to predict or control. The Company's business is heavily dependent on third parties, many of whom are themselves heavily dependent on technology. For example, like all other telecommunications providers, the Company must interconnect its networks with other carriers and service providers in order to provide end-to-end service to customers. The Company cannot control the Year 2000 readiness of those parties but does plan to test its interfaces with them and to work with these parties to resolve any difficulties. In some cases, the Company's third party dependence is on vendors of technology who are themselves working towards solutions to Year 2000 problems, such as suppliers of software systems for billing, ordering and other key business operations.

13. What communications channels has your company established with the Department of Emergency Services' Emergency operations Center? With other industries/companies that depend on your company's services?

Time Warner Telecom has established an emergency help line for all of its customers. Access to this emergency help line enables our customers to have the quickest possible access to the Time Warner Telecom support teams.

14. Please describe your company's contingency or disaster recovery plans for Year 2000 related network problems and the status of such plans. If such plans are still being developed, please report the expected completion date. If such plans are complete, please bring a copy to the workshop. If such plans are not yet complete, please submit a copy to this Commission's Division of Communications prior to July 1, 1999.

Time Warner Telecom has disaster recovery plans and contingency plans for all of our systems. These plans are currently undergoing a full review to ensure they adequately address any Y2K issues. The company should finish this review during the 3Q99. These plans are proprietary to Time Warner Telecom.