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January 4, 2000

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via Hand Delivery

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

Re: Petition of BellSouth Telecommunications, Inc. for Arbitration of the Interconnection Agreement Between Time Warner Telecom of Florida, L.P., pursuant to Section 252 (b) of the Telecommunications Act of 1996 -- Docket No. 991605 -TP

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen copies of the Request for Representation by a Qualified Representative on behalf of Time Warner Telecom of Florida, L.P. for the above-referenced docket. You will also find a copy of this letter enclosed. Please date-stamp this copy to indicate that the original was filed and return a 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,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.

Karen Camechis
Karen M. Camechis

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KMC/tmz
Enclosures

cc: All Parties of Record (w/ enclosure)

DOCUMENT NUMBER-DATE

00092 JAN -4 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition of BellSouth)
Telecommunications, Inc. for)
arbitration of interconnection)
agreement with Time Warner)
Telecom of Florida, L.P.,)
pursuant to Section 252(b) of the)
Telecommunications Act of 1996.)**

Docket No. 991605-TP

Filed: January 4, 2000

**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 the above-referenced proceeding. 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:

**Carolyn M. Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Telecom
233 Bramerton Court
Franklin, Tennessee 37069
(615) 376-6404**

2. Time Warner is aware of the services Ms. Marek can provide and is aware that Time Warner can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, Time Warner is currently represented by attorneys who

DOCUMENT NUMBER-DATE

00092 JAN-48

FPSC-RECORDS/REPORTING

are members of The Florida Bar and Time Warner will retain such counsel throughout this proceeding. Ms. Marek's representation will be limited to providing oral comment as appropriate and relevant at Commission hearings related to this docket.

3. Time Warner submits that Ms. Marek possesses the necessary qualifications to responsibly represent Time Warner's interests in this matter. In this regard, Ms. Marek's qualifications are set forth in the attached affidavit.

4. Ms. Marek possesses and will continue to acquire actual knowledge of the factual and legal issues involved insofar as her representation of Time Warner is concerned.

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

Respectfully,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.


Karen M. Camechis

KMC/kmc
Enclosures

cc: All Parties of Record (w/ enclosure)

CERTIFICATE OF SERVICE
DOCKET NO. 991605-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail on this 4 day of January, 2000, to the following parties of record:

BellSouth Telecommunications, Inc.
Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: 222-8640

Florida Cable Telecommunications Assoc., Inc.
Michael A. Gross
310 N. Monroe St.
Tallahassee, FL 32301
Phone: 850-681-1990
Fax: 681-9676
EMail: mgross@fcta.com

Time Warner Telecom of Florida, L.P.
Ms. Carolyn Marek
% Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069
Phone: (615) 376-6404
Fax: (615) 376-6405
EMail: carolyn.marek@twtelecom.com
Represented by: Pennington Law Firm


KAREN M. CAMECHIS, ESQ.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of BellSouth)
Telecommunications, Inc. for)
arbitration of interconnection)
agreement with Time Warner)
Telecom of Florida, L.P.,)
pursuant to Section 252(b) of the)
Telecommunications Act of 1996.)

Docket No. 991605-TP

Filed: January , 2000

AFFIDAVIT OF CAROLYN M. MAREK

STATE OF TENNESSEE
COUNTY OF *Davidson*

I, Carolyn M. Marek, being first duly sworn, do hereby depose and state as follows:

1. I am currently employed by Time Warner Telecom of Florida, L.P., ("Time Warner") as Vice President of Regulatory Affairs for the Southeast Region, at the address and telephone number below.

2. I have eighteen years experience in the telecommunications industry; have held various positions in the telecommunications industry including sales, sales management, project management, executive support, regulatory and governmental affairs; have testified and advocated Time Warner positions before the Florida Public Service Commission on other matters; have knowledge of factually similar proceedings in Florida as well as knowledge of similar proceedings in other states; and have knowledge of federal and Florida laws and rules regarding telecommunications.

3. I have extensive knowledge of the factual and legal issues involved in this proceeding and possess the qualifications necessary to represent Time Warner's interests in a manner that will not impair the fairness of this proceeding or the correctness of the action to be taken.

4. I have knowledge of and will comply with the Standards of Conduct for Qualified Representatives set forth in Rule 28-106.107.


Carolyn M. Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Telecom
233 Bramerton Court
Franklin, Tennessee 37069
(615) 376-6404

SWORN TO AND SUBSCRIBED before me this 3rd day of Jan, 2000 by Carolyn Marek, who (X) is personally known to me; or () who has presented _____ as identification.

Lynn Walraven

Notary Public, State of Tennessee

Commission Number:

My Commission expires: 1/25/00