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January 18, 2000

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

via Hand Delivery

RECEIVED-FPSC
00 JAN 18 AM 11:02
RECORDS AND REPORTING

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 Time Warner Telecom of Florida, L.P.'s Joint Motion to Amend Procedural Schedule 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 M. Camechis
Karen M. Camechis

- AFA _____
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- OTH _____

KMC/tmz
Enclosures

RECEIVED & FILED

cc: All Parties of Record (w/ enclosure)

DOCUMENT NUMBER-DATE

FPSC-BUREAU OF RECORDS 00656 JAN 18 8

#PSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BELLSOUTH)	
TELECOMMUNICATIONS, INC.)	DOCKET NO. 991605-TP
for Arbitration of the Interconnection)	Filed: January 18, 2000
Agreement Between TIME WARNER)	
TELECOM OF FLORIDA, L.P.,)	
Pursuant to Section 252(b) of the)	
<u>Telecommunications Act of 1996.</u>)	

JOINT MOTION TO AMEND PROCEDURAL SCHEDULE

To provide for the resolution of this matter by the Florida Public Service Commission ("Commission"), BellSouth Telecommunications, Inc. ("BellSouth") and Time Warner Telecom of Florida, L.P. ("Time Warner") respectfully submit the following Joint Motion to Amend the Procedural Schedule in this case.

1. Time Warner and BellSouth have submitted the following issue for resolution by the Commission: What should be the appropriate definition of "local traffic" for purposes of the parties' reciprocal compensation obligations under Section 251(b)(5) of the 1996 Act?

2. The Commission has set this matter for hearing on February 2, 2000. In lieu of a hearing, Time Warner and BellSouth jointly move that the above-referenced issue be resolved by the Commission taking administrative notice of the records developed in the following proceedings:

In Re: Petition by ICG Telecom Group, Inc for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. pursuant to Section 252(b) of the Telecommunications Act of 1996
Docket No. 990691-TP ("ICG proceeding")

In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996
Docket No. 990750-TP ("DeltaCom proceeding")

DOCUMENT NUMBER-DATE

00656 JAN 18 8

FPSC-RECORDS/REPORTING

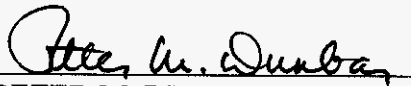
The parties move that the record from these proceedings as well as the prefiled testimony submitted in this proceeding be used as the evidentiary record for the Commission's decision in this arbitration and, in the event either party appeals the determination of the Commission in this arbitration, that the record from the ICG proceeding and the DeltaCom proceeding be included in the record on appeal.

3. The parties move that briefs be submitted on February 25, 2000 which may reference the record developed in the ICG and DeltaCom proceedings as well as the prefiled testimony in this proceeding.

4. Time Warner and BellSouth agree, provided the Commission approves the proposed procedure set forth in Paragraphs 2 and 3 above, that the case be submitted to the Commission for resolution without a hearing or cross-examination.


RESPECTFULLY SUBMITTED this 18TH day of January, 2000.

TIME WARNER TELECOM
OF FLORIDA, L.P.


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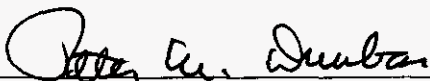
CERTIFICATE OF SERVICE
DOCKET NO. 991605-TP

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been served by U.S. Mail on this 18th day of January, 2000, to the following parties of record:

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