

ORIGINAL  
RECEIVED - FPSC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into appropriate methods to  
compensate carriers for exchange of traffic subject  
to Section 251 of the Telecommunications Act of 1996.

Docket No. 000095-TP  
Filed: February 29, 2000  
09 FEB 29 PM 3:59  
RECORDS AND  
REPORTING

**TIME WARNER TELECOM OF FLORIDA L.P.'S  
PETITION FOR LEAVE TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, Time Warner Telecom of Florida,  
L.P. ("Time Warner"), by and through its undersigned counsel, hereby petitions for leave to intervene  
in this docket, and states as follows:

1. The address and telephone number of Time Warner are as follows:

Time Warner Telecom of Florida, L.P.  
c/o Carolyn Marek  
233 Bramerton Court  
Franklin, Tennessee 37069  
(615)376-6404  
(615)376-6405 (facsimile)

2. All notices, pleadings, and other documents in this matter should be directed to Time

Warner's legal counsel at the following address:

**PETER M. DUNBAR, ESQ.**  
Florida Bar No. 146594  
**KAREN M. CAMECHIS, ESQ.**  
Florida Bar No. 0898104  
**PENNINGTON, MOORE, WILKINSON,  
BELL & DUNBAR, P.A.**  
Post Office Box 10095 (32302)  
215 S. Monroe Street, 2nd Floor  
Tallahassee, Florida 32301  
(850) 222-3533  
(850) 222-2126 (facsimile)  
E-mail: [Pete@penningtonlawfirm.com](mailto:Pete@penningtonlawfirm.com)  
E-mail: [Karen@penningtonlawfirm.com](mailto:Karen@penningtonlawfirm.com)

AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU Marek  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 1  
MAS \_\_\_\_\_  
OPC \_\_\_\_\_  
RRR \_\_\_\_\_  
SEC 1  
WAW \_\_\_\_\_  
OTH Stang

3. The Commission granted Time Warner a certificate of authority in Docket No. 95-0906

Done 3/02/00

February 29, 2000 (1:58)

G:\USERS\theresa\Time Warner Dockets\000075-TP\000095-TP\000095-TP

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02682 FEB 29 8 000046

FPSC-RECORDS/REPORTING

to provide services as an Alternative Local Exchange Company ("ALEC") in Florida. Time Warner is a facilities-based carrier presently providing exchange access and local exchange telecommunications services in Florida. Accordingly, Time Warner is subject to the rules, regulations, and orders of the Commission, and such rules, regulations, and orders impact Time Warner in the provision of telecommunications services in Florida, and Time Warner's ability to compete.

4. Time Warner's interests may or will be substantially and directly affected by the Commission's decision in this docket inasmuch as Time Warner is an ALEC which exchanges traffic with local exchange companies in order to provide local exchange service. The Commission's decision in this generic docket will likely have precedential impact on future decisions of the Commission and, in turn, upon Time Warner. Thus, the interests of Time Warner Telecom may or will be substantially affected by any decision regarding compensation methods for the exchange of traffic.

For the reasons stated above, Time Warner respectfully requests that the Commission grant this Petition for Leave to Intervene and accord Time Warner full party status in this proceeding.

Respectfully submitted this 29<sup>th</sup> day of February 2000.



**PETER M. DUNBAR, ESQ.**

Fla. Bar No. 146594

**KAREN M. CAMECHIS, ESQ.**

Fla. Bar No. 0898104

Pennington, Moore, Wilkinson,

Bell & Dunbar, P.A.

Post Office Box 10095

Tallahassee, Florida 32302-2095

(850) 222-3533

(850) 222-2126 (fax)

Counsel for: Time Warner Telecom  
of Florida, L.P.

**CERTIFICATE OF SERVICE**  
**DOCKET NO. DOCKET 000075-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Leave to Intervene has been served by U.S. Mail on this 29<sup>th</sup> day of February, to the following parties of record:

AT&T  
Tracy Hatch  
101 North Monroe Street, Suite 700  
Tallahassee, FL 32301-1549

BellSouth Telecommunications, Inc.  
Ms. Nancy B. White  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Florida Cable Telecommunications  
Assoc., Inc.  
Michael A. Gross  
310 N. Monroe St.  
Tallahassee, FL 32301

GTE Florida Incorporated  
Kimberly Caswell  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

MCI WorldCom  
Ms. Donna C. McNulty  
325 John Knox Road, Suite 105  
Tallahassee, FL 32303-4131

MediaOne Florida Telecommunications, Inc.  
c/o Laura L. Gallagher, P.A.  
101 E. College Ave., Suite 302  
Tallahassee, FL 32301

Messer Law Firm  
Floyd Self  
P.O. Box 1876  
Tallahassee, FL 32302

Rutledge Law Firm  
Kenneth Hoffman/John Ellis  
P.O. Box 551  
Tallahassee, FL 32302-0551

Sprint-Florida, Incorporated  
Charles J. Rehwinkel/Susan Masterton  
P.O. Box 2214  
MS: FLTLHO0107  
Tallahassee, FL 32316-2214

Supra Telecom  
Mrs. Doris M. Franklin  
1311 Executive Center Drive, Suite 200  
Tallahassee, FL 32301

  
KAREN M. CAMECHIS, ESQ.