

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into pricing of )  
Unbundling network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Dated: May 23, 2000

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RECORDS AND REPORTING

RESPONSE OF TIME WARNER TELECOM OF FLORIDA, L.P.  
TO MOTION FOR EXTENSION OF TIME FOR FILING TESTIMONY

Time Warner Telecom of Florida, L.P. ("Time Warner") responds to the Motion for

Extension of Time for Filing Testimony filed jointly by AT&T Communications of the Southern States, Inc., MCI WorldCom, Inc., and Florida Competitive Carriers Association (collectively "Movants"), and states as follows by and through its undersigned counsel:

1. The schedule for this docket currently requires ALECs to file direct testimony on June 1, 2000, and ILECs to file rebuttal testimony on June 22, 2000. The hearing is scheduled to begin on July 17, 2000.

2. On May 17, 2000, Movants filed a Motion for Extension of Time For Filing Testimony requesting extension of the filing dates to June 15 and June 29, respectively, while leaving the hearing date unchanged.

3. The Movants stated that difficulty in accessing and manipulating the model has had a significant impact on their ability to prepare testimony. Movants further stated that they will be prejudiced in their ability to prepare testimony, and will not be able to present the Commission with information required to make an informed decision in this

docket, if the filing date is not extended. As a result, additional time was requested to analyze the model and prepare testimony.

4. Time Warner believes that it is essential for ALECs to have the opportunity to thoroughly analyze and manipulate the new cost model in order to provide the

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- RCO \_\_\_\_\_
- SEC I
- SER \_\_\_\_\_
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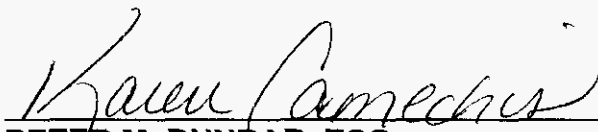
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FPSC-RECORDS/REPORTING

Commission with meaningful data upon which a fair and informed decision can be based. In light of the extensive long-term ramifications of the outcome of this docket for ALECs as well as ILECs, it does not appear unreasonable to allow an extension of fourteen days so that all parties have a full understanding of the potential issues presented by the new cost model.

**WHEREFORE**, for the above-stated reasons, Time Warner concurs with Movants' request to extend the filing date to June 15, 2000 for ALEC direct testimony, and June 29, 2000 for ILEC rebuttal testimony.

Respectfully submitted this 23<sup>rd</sup> day of May, 2000.



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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 990649-TP**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Response of Time Warner Telecom of Florida, L.P. To Motion for Extension of Time for Filing Testimony has been served by U.S. Mail on this 23<sup>rd</sup> day of May, 2000, to the following parties of record:

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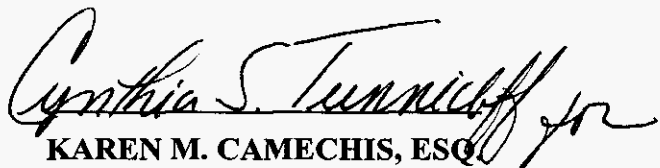
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