

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Proposed Amendments to Rule 25-4.003, F.A.C., Definitions; 25-4.110, F.A.C., Customer Billing for Local Exchange Telecommunications Companies; 25-4.113, F.A.C. Refusal or Discontinuance of Service by Company; Rule 25-24.490, F.A.C., Customer Relations; Rules Incorporated; And 25-24.845, F.A.C., Customer Relations; Rules Incorporated.

DOCKET NO. 990994-TP Filed: September 13, 2000

RECORDS AND REPORTING

TIME WARNER TELECOM OF FLORIDA, L.P.'S POST-HEARING COMMENTS

Time Warner Telecom of Florida, L.P. ("Time Warner") files the following post-hearing comments regarding proposed Rules 25-4110(2), (19), as the rules may apply to alternative local exchange companies ("ALEC"):

1. Time Warner concurs in the joint post-hearing comments filed by The Florida Competitive Carriers Association, MCI WorldCom, Inc., AT&T Communications of the Southern States, Inc., and the Association of Communications Enterprises' on September 13, 2000.

2. Time Warner is particularly concerned with the anticompetitive nature of the proposed rules, and the apparent disregard of the legislature's intent to impose less regulation on

ALECs than on ILECs. Customers of ALECs are capable of determining whether an ALECs billing format is sufficient to meet their needs and, if not, are equally capable of choosing another carrier to provide services. Time Warner respectfully submits that ALECs should retain the ability to customize billing systems to suit their customers' needs, rather than conforming all billing formats to a regimen that may not be desirable to all customers.

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COM 3
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ECR
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3. Finally, Time Warner is extremely concerned that the Commission may impose regulations that ultimately serve little or no purpose, yet have a tremendous economic impact on all ALECs, as well as competition within the industry. The Commission's own witness admitted that the Commission has not received any complaints directed against ALECs regarding bill format or unauthorized charges. (Tr.68, 74). Further, the fact that the Commission may not have gathered sufficient information to reasonably estimate the cost to the industry is equally disconcerting.

4. Accordingly, Time Warner respectfully conveys its opposition to application of the proposed rules to ALECs operating in Florida.

Respectfully submitted this 13th day of September, 2000.



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CERTIFICATE OF SERVICE
DOCKET NO. 990994-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing **Time Warner Telecom of Florida, L.P.'s Post Hearing Comments** has been served by U.S. Mail on this 13th day of September, 2000, to the following parties of record:

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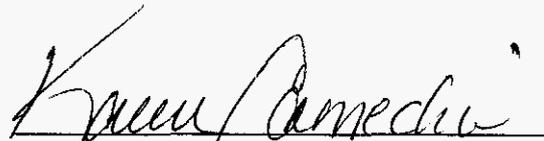
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