

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.: 000075-TP
Filed: March 12, 2001

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**TIME WARNER TELECOM OF FLORIDA, L.P.'S MOTION FOR EXTENSION
OF TIME TO RESPOND TO DISCOVERY**

By and through undersigned counsel, Time Warner Telecom of Florida, L.P., pursuant to Rule 28.106.204, Florida Administrative Code, hereby files this Motion for Extension of Time to Respond to Discovery and, in support thereof, states as follows:

1. On February 27, 2001, BellSouth Telecommunications, Inc., ("BellSouth") filed its Emergency Global Motion to Compel Time Warner Telecom of Florida, L.P. ("Time Warner") to respond to BellSouth's discovery requests served on February 2, 2001.

2. On February 8, 2001, during the hearing before the Commission, BellSouth agreed to forego responses to all its discovery requests except for Interrogatory No. 23, which reads in full as follows:

Does Time Warner own or have an interest in an ISP? Is Time Warner affiliated in any way with an ISP (other than a customer relationship)? If so, explain in full the nature of such interest or affiliation.

3. At the hearing, Chairman Jacobs asked Time Warner, as well as the other ALECs to whom the discovery request was directed, to respond to Interrogatory No. 23 by March 14, 2001. At that time, Counsel for Time Warner indicated that Time Warner

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could not agree to providing a response to Interrogatory No. 23 due to the fact that the Time Warner representative responsible for responding to BellSouth's discovery requests was unavailable due to a family medical emergency.

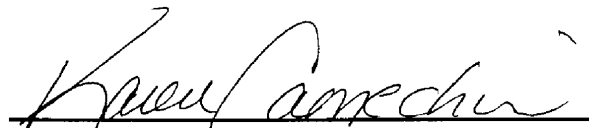
4. Time Warner's representative remains unavailable due to a family medical emergency and will be unable to provide a response to BellSouth's Interrogatory No. 23 by March 14, 2001. However, Time Warner believes a response can be provided by March 21, 2001.

5. On March 12, 2001, Counsel for Time Warner contacted James Meza, Counsel for BellSouth, who agreed to extending the time for Time Warner to respond to Interrogatory No. 23 until March 21, 2001.

WHEREFORE, Time Warner requests an extension of time to file its Response to BellSouth's Interrogatory No. 23 until March 21, 2001.

Respectfully submitted this 12th day of March, 2001.

TIME WARNER TELECOM OF FLORIDA, L.P.



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CERTIFICATE OF SERVICE
DOCKET NO. 000075

I **HEREBY CERTIFY** that a true and correct copy of the foregoing **Time Warner Telecom of Florida, L.P.'s Motion for Extension of Time to Respond to Discovery** by U.S. Mail on this 12th day of March, 2001, to the following parties of record:

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