

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Time Warner Telecom)
of Florida, L.P. Against Verizon Florida Inc.,)
as successor to GTE Florida Incorporated,)
for Breach of Terms of Florida Interconnection)
Agreement under Sections 251 and 252 of the)
Telecommunications Act of 1996, and)
Request for Relief)
_____)

Docket No. 020355-TP
Filed: May 28, 2002

**REQUEST FOR REPRESENTATION BY
A QUALIFIED REPRESENTATIVE**

Time Warner Telecom of Florida, L.P. ("Time Warner"), through its undersigned counsel, submits this Request for Representation by a Qualified Representative pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding. In support thereof, Time Warner states as follows:

1. Time Warner seeks leave of the presiding officer for the following individual to appear on behalf of Time Warner as a qualified representative in this proceeding:

Charles B. Welch, Jr., Partner
Farris, Mathews, Branam
Bobango & Hellen, P.L.C.
618 Church Street, Suite 303
Nashville, TN 37219
(615)726-1200

2. Time Warner is aware of the services Mr. Welch can provide and is aware that Time Warner can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, Time Warner is currently represented by attorneys who are members of The Florida Bar and Time Warner will retain such counsel throughout this proceeding.

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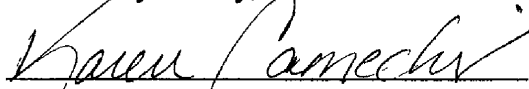
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3. Time Warner submits that Mr. Welch possesses the necessary qualifications to responsibly represent Time Warner's interests in this matter. In this regard, Mr. Welch's qualifications are set forth in the attached affidavit.

4. Mr. Welch has practiced extensively before the Tennessee Regulatory Authority and other states' utility regulatory agencies or authorities; has knowledge of the Florida Rules of Civil Procedure relating to the discovery in an administrative proceeding; has knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; has acquired or will acquire knowledge of the factual and legal issues in this matter; and has knowledge of and compliance with the standards of conduct for qualified representatives contained in Rule 28-106.107 of the Florida Administrative Code.

WHEREFORE, for the foregoing reasons, Time Warner requests that Mr. Welch be permitted to appear as a qualified representative on behalf of Time Warner.

RESPECTFULLY SUBMITTED this 28th day of May, 2002.



PETER M. DUNBAR, ESQ.

Florida Bar No. 146594

KAREN M. CAMECHIS, ESQ.

Florida Bar No. 0898104

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

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_____)**

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Filed:**

AFFIDAVIT OF CHUCK B. WELCH, JR.

**STATE OF TENNESSEE
COUNTY OF DAVIDSON**

I, Chuck B. Welch, Jr., being first duly sworn, do hereby depose and state as follows:

1. I am an attorney employed by Farris, Mathews, Branam, Bobango & Hellen, P.L.C., which is located at 618 Church Street, Suite 303, Nashville, TN 37219, (615)726-1200.

2. I am a member in good standing of the State Bar of Tennessee, Bar No. 5593, and am seeking designation as a qualified representative of Time Warner Telecom of Florida, L.P., pursuant to Rule 28-106.106, Florida Administrative Code.

3. I have represented telecommunications clients before this and other regulatory agencies in numerous regulatory proceedings.

4. I am familiar with jurisdictional issues, the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure related to discovery in administrative proceedings, the Florida Administrative Code, and the Florida Rules of Evidence including the concept of hearsay in administrative proceedings.

5. I have or will acquire knowledge of the factual and legal issues in this matter, and have complied with, and will continue to comply with, the Standards of Conduct for Qualified Representatives set forth in Rule 28-106.107, Florida Administrative Code.

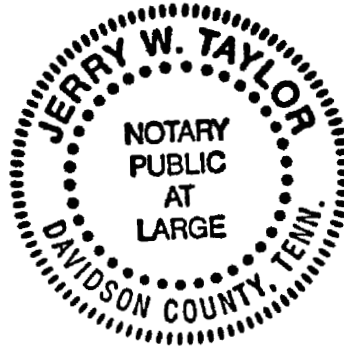
I declare that the foregoing is true and correct based on my knowledge, information and belief.

Charles B. Welch, Jr.
Charles B. Welch, Jr.

Subscribed and sworn to before me
this 24 day of May, 2002.

Jerry W. Taylor
Notary Public

My Commission Expires: 1-29-05



CERTIFICATE OF SERVICE
DOCKET NO. 020355-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing **Time Warner Telecom of Florida, L.P.'s Request for Representation by a Qualified Representative** has been served by U.S. Mail on this 28th day of May, 2002, to the following parties of record:

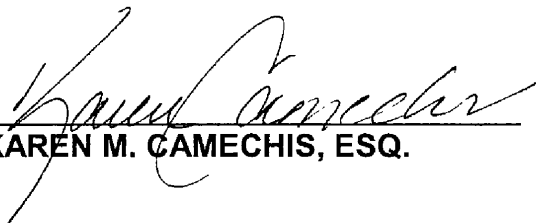
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Florida Cable Telecommunications Assoc.,
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