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October 28, 2002

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 110
Betty Easley Conference Center
Tallahassee, FL 32399-0850

VIA HAND DELIVERY

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Re: Docket Nos. 020119-TP and 020578-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Time Warner Telecom of Florida, L.P. ("Time Warner") are the following documents:

1. Original and fifteen copies of Time Warner's Objections to BellSouth Telecommunications, Inc.'s First Requests for Production of Documents; and **11811-02**
2. Original and fifteen copies of Time Warner's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories. **11812-02**

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Martin P. McDonnell

MPM/rl

Enclosures

cc: All Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Digital Network,)
Inc., for Expedited Review and Cancellation)
of BellSouth's Telecommunications, Inc.'s) Docket No. 020119-TP
Key Customer Promotional Tariffs)
and For an Investigation of BellSouth)
Telecommunications, Inc.'s Promotional)
Pricing and Marketing Practices.)
_____)

In re: Petition of the Florida Competitive Carriers)
Association for Expedited Review and Cancellation) Docket No. 020578-TP
of BellSouth Telecommunications, Inc.'s Key)
Customer Promotional Tariffs.)
_____) Filed: October 28, 2002

**TIME WARNER TELECOM OF FLORIDA, L.P.'S OBJECTIONS TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Order No. PSC-02-1295-PCO-TP, issued September 23, 2002, Time Warner Telecom of Florida, L.P. ("Time Warner") submits these Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Requests for Production of Documents.

GENERAL OBJECTIONS

Time Warner makes these General Objections to the Requests and incorporates each of the General Objections into its specific objections to each Request.

1. Time Warner objects to the Requests to the extent they seek information that is privileged or otherwise exempt from discovery, including but not limited to documents or information protected by the attorney-client privilege, the work-product doctrine, or the trade-secrets doctrine.

2. BellSouth asserts in its First Set of Interrogatories to Time Warner that "these interrogatories are continuing in nature and require supplemental responses should information

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unknown to you at the time you serve your responses to these interrogatories subsequently become known or should your initial response be incorrect or untrue. Pursuant to Florida Rule of Civil Procedure 1.280(e), Time Warner objects to BellSouth's request to require supplemental responses. Fla.R.Civ.P. 1.280(e) states that:

a party who has responded to a request for discovery with a response that was complete when made is under no duty to supplement the response to include information thereafter acquired.

3. Time Warner will make a reasonable effort to respond to a Request as Time Warner understands and interprets such Request. If BellSouth should assert an interpretation of any Request that differs from Time Warner's, Time Warner reserves the right to supplement or amend its objections. Time Warner further reserves the right to produce responsive documents or information received after the date of its Response.

4. Time Warner expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity or relevancy of the responses produced pursuant to the Requests.

5. BellSouth's Requests for Production of Documents ask only for documents that are identified or supporting Time Warner's responses to Interrogatories. Therefore, Time Warner incorporates all of its objections to BellSouth's Interrogatories in all of its objections to BellSouth's corresponding Requests for Production of Documents.

OBJECTIONS TO BELLSOUTH'S REQUESTS

Many of the specific objections that Time Warner makes are applicable to several of BellSouth's Requests. For this reason, Time Warner provides the following definitions of those objections and, where applicable, repeats only the defined term in stating its specific objections.

1. Relevance: the request is not relevant to any specific claims, defenses, issues or questions presented in this proceeding and is not reasonably calculated to lead to the discovery of information relevant to resolution of the issues.

2. Unduly Burdensome: the request is unduly burdensome in that providing the requested data (i) would require an unreasonable expenditure of time and resources to search for documents or information; (ii) is cumulative and/or has only a limited likelihood of leading to the discovery of data relevant to resolution of the specific issue; and (iii) either (a) the value of providing the data is outweighed by the burden of production or (b) BellSouth can obtain the data through publicly available information.

3. Overly Broad: the request seeks a general category of information within which only certain portions of the information are reasonably related to the subject matter of this proceeding.

4. Vague and Ambiguous: the request is vague and ambiguous in that it does not describe the data sought with particularity or fails to convey with reasonable clarity what is being requested and, as such, Time Warner cannot reasonably determine the intended meaning, scope or limits of BellSouth's Request.

5. Commercially Sensitive, Proprietary, and Confidential: the requested data relates to issues, matters, or materials that contain proprietary, confidential, and/or trade secret information which would cause competitive harm to Time Warner if disclosed.

6. Calls for a legal conclusion: the request calls for a conclusion of law.

SPECIFIC OBJECTIONS TO REQUESTS

1. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 1.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 1.

2. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 2.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 2.

3. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 3.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 3.

4. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 4.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 4.

5. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 5.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 5.

6. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 6.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 6.

7. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 7.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 7.

8. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 8.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 8.

9. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 9.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 9.

10. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 10.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 10.

11. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 11.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 11.

12. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 12.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 12.

13. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 13.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 13.

14. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 14.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 14.

15. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 15.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 15.

16. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 16.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 16.

17. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 17.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 17.

18. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 18.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 18.

19. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 19.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 19.

20. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 20.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 20.

21. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 21.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 21.

22. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 22.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 22.

23. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 23.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 23.

24. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 24.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 24.

25. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 25.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 25.

26. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 26.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 26.

27. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 27.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 27.

28. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 28.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 28.

29. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 29.

Objection:

Time Warner incorporates herein its objection to Interrogatory No. 29.

30. Please produce all documents that are identified in or that support you response to BellSouth's First Set of Interrogatories, Item No. 30.

Objection:

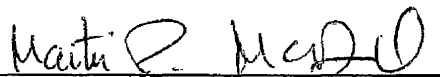
Time Warner incorporates herein its objection to Interrogatory No. 30.

31. Please produce a full and complete copy of your responses (including any attachments thereto) to the "Year 2001 Local Competition Report Data Request" and the "Year 2002 Local Competition Report Data Request" served by the Florida Public Service Commission.

Objection:

Time Warner objects to the extent the information requested is confidential or otherwise filed with the Commission and available to BellSouth.

Respectfully submitted,



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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 28th day of October, 2002:

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