

ORIGINAL

Pennington  
Moore  
Wilkinson  
Bell &  
Dunbar P.A.  
ATTORNEYS AT LAW  
www.penningtonlaw.com

Linda Noel  
Attorney at Law

(850) 222-3533  
linda@penningtonlaw.com

April 28, 2004

Ms. Blanca Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECEIVED-11:50  
APR 28 PM 2:25  
COMMISSION  
CLERK

RE: **Undocketed matter regarding "Extended Calling Service"**

Dear Ms. Bayo:

Enclosed for filing on behalf of Time Warner Telecom of Florida, L.P. ("Time Warner") are the original and 7 copies of Time Warner's comments for the Undocketed matter regarding "Extended Calling Service."

Please acknowledge receipt of this filing by stamping a copy of this letter and returning the same to me. If you have any questions with regard to the foregoing, please do not hesitate to contact me.

Respectfully,

PENNINGTON, MOORE, WILKINSON,  
BELL & DUNBAR, P.A.

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

- CMP
- COM
- CTR
- ECR
- GCL
- OPC
- MMS
- RCA
- SCR
- SEC
- OTH

Cc: Carolyn Marek, Time Warner Telecom of Florida, L.P.

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04937 APR 28 03

Linda Noel  
Attorney at Law

(850) 222-3533  
linda@penningtonlaw.com

April 28, 2004

Ms. Blanca Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: ***Undocketed matter regarding "Extended Calling Service"***

Dear Ms. Bayo:

In the Revised Notice of Commission Workshop issued March 29, 2004, the Florida Public Service Commission ("Commission") extended an invitation for comments from all Incumbent Local Exchange Companies ("ILEC"), Competitive Local Exchange Companies ("CLEC"), and all Interexchange Companies. To that end, the Commission prepared and distributed a list of issues to be discussed at the workshop. Time Warner Telecom of Florida, L.P. ("Time Warner"), respectfully submits the following comments with regards to the stated issues.

- 1) How do Extended Calling Service (ECS) calling plans affect competition in today's market?

Extended Calling Plans are most beneficial in the marketplace and can provide a competitive advantage. Customers are always looking for ways to reduce their costs. If a CLEC is able to offer an ECS plan without incurring high access costs, this provides a competitive advantage in the marketplace.

- 2) Is ECS necessary in today's market with the availability of bundled package deals and potentially lower access charges?

Absolutely. Sometimes ECS becomes part of a bundled offer. Time Warner has seen situations where on competitor will waive the ECS charge just to sign the deal.

DOCUMENT NUMBER DATE

04937 APR 28 2004

- 3) What, if any, alternatives are there to ECS in today's market?

There are several alternatives to ECS service. They are: (a) LATA-Wide calling; (b) VoIP, will soon serve as an alternative; and (c) Foreign exchange products. Most important to note is that the inter-carrier compensation paid on a wholesale basis needs to align with the retail price charged to end users. In other words, a LEC can realistically only offer LATA-Wide calling as part of a local calling plan if they are paying periodic reciprocal compensation versus access charges for inter-carrier compensation

- 4) What is the current PSC authority regarding Extended Area Service?

The FPSC has authority over all regulated intrastate telecommunications services including Extended Area Service.

- 5) What is the current PSC authority regarding Extended Calling Service?

The FPSC has authority over all regulated intrastate telecommunications services including ECS.

- 6) Is ECS considered a basic or non-basic service?

Currently, ECS is considered a non-basic service and most of these plans are optional.

We appreciate this opportunity to provide comments to the Commission and are available if the Commission has any questions regarding the above.

Respectfully,

PENNINGTON, MOORE, WILKINSON,  
BELL & DUNBAR, P.A.



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

Cc: Carolyn Marek, Time Warner Telecom of Florida, L.P.