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ORIGINAL

May 1, 2006

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COMMISSION
CLERK
05 MAY -1 PM 4:46

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

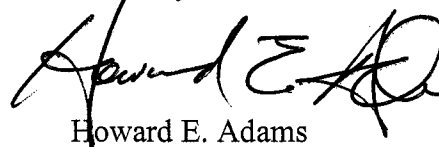
RE: In re: Time Warner Telecom of Florida, L.P. Comments Regarding Proposed
Rules Governing Placement of New Electric Distribution Facilities
Underground. Docket No. 060172-EU

Dear Ms. Bayo:

Enclosed are the original and three copies of comments by Time Warner Telecom of
Florida, L. P., regarding the proposed rules governing placement of new electric distribution
facilities underground and conversions of existing overhead distribution facilities to underground
facilities, to address effect of extreme weather events, which we ask that you file in the above-
captioned docket.

CMP _____
COM _____
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Sincerely,


Howard E. Adams

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FPSC-BUREAU OF RECORDS

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Path\G\Jodi\Gene\TimeWarner\Comments regarding Proposed Rule Place New Electric Facilities Underground 060172-EU

DOCUMENT NUMBER - DATE
03841 MAY -1 06
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Proposed rules governing placement of new electric distribution facilities underground, and conversions of existing overhead distribution facilities to underground facilities, to address effects of extreme weather events

DOCKET NO. 060172-EU

Dated: May 1, 2006

TIME WARNER TELECOM OF FLORIDA, L.P.
COMMENTS REGARDING PROPOSED RULE DEVELOPMENT

Comes now Time Warner Telecom of Florida, L.P. and files these comments before the Florida Public Service Commission in the above styled docket.

1. Time Warner Telecom of Florida, L.P., a competitive telecommunications provider, is interested in the notice of proposed rule development regarding the proposed rules governing new electric distribution facilities underground and conversion of current overhead distribution facilities to underground facilities.
2. Time Warner Telecom of Florida, L.P. is further interested in comments made by Tampa Electric Company and others at the prior rule development workshop regarding collocation of facilities and collocation for telecommunications facilities currently attached to poles and other such facilities will be addressed in these rules and or proceedings.
3. Time Warner Telecom of Florida, L.P. is a competitive local exchange carrier and has current agreements pursuant to federal law and interconnection and franchise agreements with government entities, other telecommunications and utility providers for collocation of communications infrastructure.

DOCUMENT NUMBER-DATE

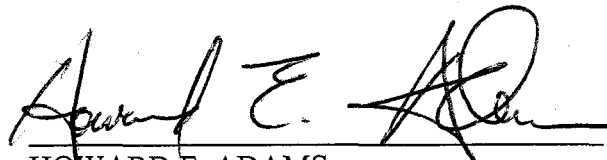
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FPSC-COMMISSION CLERK

4. This Commission should in its review of these rules and in discussions address definitively how charges and expenses for underground collocation and location of facilities should be addressed in order to equitably address these cost issues and to provide such charges are included in the rate base and appropriately allocated to end user customers.

5. Time Warner Telecom of Florida, L.P. is currently in agreement with the Commission's suggestions to show these as contributions in aid of construction and as an allocation to users which is pursuant to current law and rules. Time Warner Telecom of Florida, L.P. will continue to furnish information and further comments as these rules are developed.

Respectfully submitted this 1st day of May 2006.



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