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REPLY TO:  
P.O. BOX 10095  
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January 6, 2000

ORIGINAL

via Hand Delivery

RECORDS AND REPORTING

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Ms. Blanco Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
Betty Easley Conference Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Petition of BellSouth Telecommunications, Inc. for Arbitration of the Interconnection Agreement Between Time Warner Telecom of Florida, L.P., pursuant to Section 252 (b) of the Telecommunications Act of 1996 -- Docket No. 991605 -TP

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen copies of the Request for Representation by a Qualified Representative on behalf of Time Warner Telecom of Florida, L.P. for the above-referenced docket. You will also find a copy of this letter enclosed. Please date-stamp this copy to indicate that the original was filed and return a copy to me.

If you have any questions regarding this matter, please feel free to contact me. Thank you for your assistance in processing this filing.

Respectfully,

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

*Karen M. Camechis*  
Karen M. Camechis

RECEIVED & FILED

*M. C.*  
FPSC-BUREAU OF RECORDS

KMC/tmz  
Enclosures

cc: All Parties of Record (w/ enclosure)

DOCUMENT NUMBER-DATE

00250 JAN-68

FPSC-RECORDS/REPORTING

APP  
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SEC  
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OTH

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of BellSouth )  
Telecommunications, Inc. for )  
arbitration of interconnection )  
agreement with Time Warner )  
Telecom of Florida, L.P., )  
pursuant to Section 252(b) of the )  
Telecommunications Act of 1996. )  
\_\_\_\_\_ )

Docket No. 991605-TP

Filed: January 6, 2000

**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.

DOCUMENT NUMBER-DATE

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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 6<sup>th</sup> day of January, 2000.



**PETER M. DUNBAR, ESQ.**

Florida Bar No. 146594

**KAREN M. CAMECHIS, ESQ.**

Florida Bar No. 0898104

PENNINGTON, MOORE, WILKINSON,  
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(850) 222-3533

(850) 222-2126 (facsimile)

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

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 991605-TP**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been served by U.S. Mail on this 6th day of January, 2000, to the following parties of record:

BellSouth Telecommunications, Inc.  
Ms. Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556  
Phone: (850) 224-7798  
Fax: 222-8640

Florida Cable Telecommunications Assoc., Inc.  
Michael A. Gross  
310 N. Monroe St.  
Tallahassee, FL 32301  
Phone: 850-681-1990  
Fax: 681-9676  
EMail: mgross@fcta.com

Time Warner Telecom of Florida, L.P.  
Ms. Carolyn Marek  
% Time Warner Telecom  
233 Bramerton Court  
Franklin, TN 37069  
Phone: (615) 376-6404  
Fax: (615) 376-6405  
EMail: carolyn.marek@twtelecom.com  
Represented by: Pennington Law Firm

  
**KAREN M. CAMECHIS, ESQ.**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of BellSouth )  
Telecommunications, Inc. for )  
arbitration of interconnection )  
agreement with Time Warner )  
Telecom of Florida, L.P., )  
pursuant to Section 252(b) of the )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

Docket No. 991605-TP

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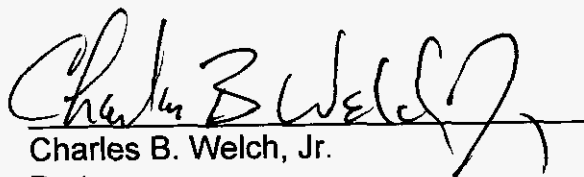
AFFIDAVIT OF CHARLES B. WELCH, JR.

STATE OF TENNESSEE  
COUNTY OF DAVIDSON

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

1. Undersigned counsel is currently a partner the law firm of Farris, Mathews, Branam, Bobango & Hellen, P.L.C., the address and telephone number listed below.
2. Undersigned counsel possesses the necessary qualifications to adequately and responsibly represent Time Warner Telecom of Florida, L.P., having served as counsel for Time Warner's telecommunications operations throughout the Southeast region since September, 1994.
3. Undersigned counsel is an attorney admitted to practice, and is a member in good standing in the state of Tennessee, Bar Number 5593; has practiced extensively before the Tennessee Regulatory Authority and other states' utility regulatory agencies or authorities; has knowledge of the Florida Statutes relative to the Commission's jurisdiction; 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.



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

Sworn to and subscribed before me this the 5<sup>th</sup> day of January, 2000.

My Commission Expires:  
3-23-2002

  
Notary Public