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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies.

Docket No. 000121-TE Filed: February 29, 2000 FPORTING A L.P.'S ENE

TIME WARNER TELECOM OF FLORIDA L.P.'S <u>PETITION FOR LEAVE TO INTERVENE</u>

Pursuant to Rule 25-22.039, Florida Administrative Code, Time Warner Telecom of Florida,

L.P. ("Time Warner"), by and through its undersigned counsel, hereby petitions for leave to intervene

in this docket, and states as follows:

3

1. The address and telephone number of Time Warner are as follows:

Time Warner Telecom of Florida, L.P. c/o Carolyn Marek 233 Bramerton Court Franklin, Tennessee 37069 (615)376-6404 (615)376-6405 (facsimile)

2. All notices, pleadings, and other documents in this matter should be sent to Time

Warner's legal counsel at the following address :

	PETER M. DUNBAR, ESQ.	
	Florida Bar No. 146594	
	KAREN M. CAMECHIS, ESQ.	
2	Florida Bar No. 0898104	
AFA	PENNINGTON, MOORE, WILKINSON,	
CAE	BELL & DUNBAR, P.A.	
CMU S	Post Office Box 10095 (32302)	
CTR	215 S. Monroe Street, 2nd Floor	
	Tallahassee, Florida 32301	
MAS	(850) 222-3533	
OPC	(850) 222-2126 (facsimile)	
SEC	E-mail: Pete@penningtonlawfirm.com	
WAW	E-mail: Karen@penningtonlawfirm.com	
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03. The Commission granted Time Warner a certificate of authority in Docket No. 95- RECEIVED & FILED		
Jone 3/02/00		DOCUMENT NUMBER-DATE
February 29, 2000 (1:18PM) G:USERSthreesalTime Warner Dockets/000121/petition to interven.wpcFPSC-BUREAU OF RECORDSU 2683 FEB 298		
		PPSC-RECORDS/REPORTING

0906 to provide services as an Alternative Local Exchange Company ("ALEC") in Florida. Time Warner is a facilities-based carrier presently providing exchange access and local exchange telecommunications services in Florida. Accordingly, Time Warner is subject to the rules, regulations, and orders of the Commission, and such rules, regulations, and orders impact Time Warner in the provision of telecommunications services, and Time Warner's ability to compete,

4. As an ALEC, Time Warner must utilize the operations support systems of incumbent local exchange companies in order to provide local exchange service in Florida. Thus, Time Warner's interests may or will be substantially and directly affected by any decision regarding permanent performance measures for incumbant local exchange companies.

For the reasons stated above, Time Warner respectfully requests that the Commission grant its <u>Petition for Leave to Intervene</u> and accord Time Warner full party status in this proceeding.

Respectfully submitted this 29th day of February 2000.

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PETER M. DUNBAR, ESQ. Fla. Bar No. 146594 KAREN M. CAMECHIS, ESQ. Fla. Bar No. 0898104 Pennington, Moore, Wilkinson, Bell & Dunbar, P.A. Post Office Box 10095 Tallahassee, Florida 32302-2095 (850) 222-3533 (850) 222-2126 (fax)

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

· 2

CERTIFICATE OF SERVICE DOCKET NO. DOCKET 000121-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Leave to

Intervene has been served by U.S. Mail on this 29th of February, to the following parties of record:

AT&T Marsha Rule 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

Florida Public Telecommunications Assoc., Inc. Michael A. Gross 310 N. Monroe St. Tallahassee, FL 32301

Florida Public Telecommunications Assoc. Angela Green, General Counsel 125 S. Gadsden St., #200 Tallahassee, FL 32301-1525

GTE Florida Incorporated Kimberly Caswell P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

MCI WorldCom Ms. Donna C. McNulty 325 John Knox Road, Suite 105 Tallahassee, FL 32303-4131 MediaOne Florida Telecommunications, Inc. c/o Laura L. Gallagher, P.A. 101 E. College Ave., Suite 302 Tallahassee, FL 32301

Messer Law Firm Floyd Self P.O. Box 1876 Tallahassee, FL 32302

Rutledge Law Firm Kenneth Hoffman/John Ellis P.O. Box 551 Tallahassee, FL 32302-0551

Supra Telecom Mrs. Doris M. Franklin 1311 Executive Center Drive, Suite 200 Tallahassee, FL 32301

KAREN M. CAMECHIS, ESQ.