

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSIO

In Re: Cost recovery and allocation issues for number pooling trials in Florida.

Docket No. 00 503- AM 10: 37

Filed: October 26, 2000

## TIME WARNER TELECOM OF FLORIDA L.P.'S PETITION FOR LEAVE TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, Time Warner Telecom of Florida, L.P. ("Time Warner"), by and through its undersigned counsel, respectfully petitions for leave to intervene in this docket as a party of record. In support of this petition, Time Warner states as follows:

1. The address and telephone number of Time Warner are as follows, and all documents issuing in this matter should be forwarded to the following addressee:

> 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 directed to Time Warner's legal counsel at the following address:

> PETER M. DUNBAR, ESQ. Florida Bar No. 146594 KAREN M. CAMECHIS, ESQ. Florida Bar No. 0898104 PENNINGTON, MOORE, WILKINSON, BELL & DUNBAR, P.A. Post Office Box 10095 (32302) 215 S. Monroe Street, 2nd Floor Tallahassee, Florida 32301 (850) 222-3533 (850) 222-2126 (facsimile) E-mail: Pete@penningtonlawfirm.com

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3. The Commission granted Time Warner a certificate of authority in Docket No. 95-0906 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 in Florida, and Time Warner's ability to compete. Inasmuch as this docket will address cost recovery and allocation issues for number pooling trials in Florida, the Commission's decision in this docket may affect the substantial interests of Time Warner and its business operations in this state.

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

Respectfully submitted this 26 day of October 2000.

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Counsel for: T

Time Warner Telecom

of Florida, L.P.

## CERTIFICATE OF SERVICE DOCKET NO. DOCKET 001503-TP

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

<u>Intervene</u> has been served by U.S. Mail on this 26th day of October, to the following parties of record:

BellSouth Telecommunications, Inc. Ms. Nancy B. White cook Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

BellSouth Telecommunications, Inc. Mr. Michael P. Goggin 150 West Flagler Street, Suite 1910 Miami, FL 33130

BellSouth Telecommunications, Inc. R. Douglas Lackey 675 W. Peachtree St., NE, #4300 Atlanta, GA 30375

Office of Public Counsel Charles Beck c/o The Florida Legislature 111 W. Madison St., #812 Tallahassee, FL 32399-1400

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

KAREN M. CAMECHIS, ESQ.