

Dorothy Menasco

From: Galloway, Cecilia (Cissy) [CGalloway@gunster.com]
Sent: Monday, December 19, 2011 4:35 PM
To: Filings@psc.state.fl.us
Cc: 'carolyn.ridley@twtelecom.com'; 'thatch@att.com'; 'sandy.khazraee@centurylink.com'; Rosanne Gervasi; 'dkonuch@fcta.com'; 'de.oroark@verizon.com'
Subject: RE: Re: PSC Filing - Docket No. 110000-OT
Attachments: Dkt 110000-OT Resp to Wrkshp Rule (3).pdf

The attached is an electronic filing for the docket referenced below. If you have any questions, please contact Matt Feil at the number below. Thank you.

Person Responsible for Filing:

Matthew Feil
 Gunster Law Firm
 215 South Monroe Street, Suite 601
 Tallahassee, FL 32301
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Docket Number: Docket No. 110000-OT

Filed on Behalf of: tw telecom of florida, l.p. ("TWTC")

Total Number of Pages: 2

Description of Documents: TWTC Comments for Staff regarding Staff Rule Development Workshop on Rule 25-4.034, 25-4.0341 and 25-24.825, Florida Administrative Code



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09048 DEC 19 =

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Writer's E-Mail Address: MFeil@gunster.com

December 19, 2011

VIA ELECTRONIC DELIVERY

Ms. Ann Cole
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Docket No. 110000-OT

Undocketed Staff Rule Development Workshop on Rules 25-4.034, 25-4.0341 and 25-24.825, Florida Administrative Code

Dear Ms. Cole:

Pursuant to the request of the Commission staff at the rule development workshop held on December 5, 2011, tw telecom of florida, l.p. ("TWTC") submits the following comments regarding the changes proposed to the captioned rules.

TWTC has no comments on the changes proposed to Rule 25-4.034 (ILEC switched access service tariffs). TWTC's comments respecting new Rule 25-4.0341 (Service Schedules) and the repeal of Rule 25-24.825 (CLEC Price Lists) are these: (1) TWTC believes the instructions and requirements for CLECs to electronically file service schedules should be available for review and comment by interested persons prior to the new rule's implementation and (2) the implementation of the new 25-4.0341 and repeal of 25-24.825 must be synchronized and contemporaneous to avoid regulatory gaps and confusion.

DOCUMENT NUMBER DATE

09048 DEC 19 =

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Ms. Ann Cole
December 19, 2011
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Sincerely,

A handwritten signature in black ink, appearing to read "Matthew J. Feil". The signature is stylized with a large, looped initial "M" and a trailing flourish.

Matthew J. Feil

MJF/

CC (all by e-mail): R. Gervasi
T. Hatch
D. Konuch
D. O'Roark
S. Khazraee
C. Ridley