

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation into allegations of anti-competitive behaviors and practices of Verizon Florida, Inc.

Docket No.: 011076 -TP Filed: August 27, 2001

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, hereby petitions for leave to intervene in this docket, and states as follows:

- 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) E-Mail: Carolyn.Marek@twtelecom.com

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

Warner at the above-listed address as well as 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 E-mail: Karen@penningtonlawfirm.com

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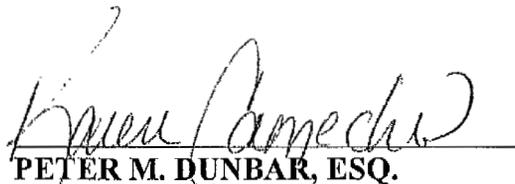
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3. The Commission granted Time Warner a certificate of authority in Docket No. 95-0906 to provide services as an Alternative Local Exchange Company ("ALEC") in Florida, and specifically provides services within territories in which Verizon Florida, Inc., is the Incumbent Local Exchange Carrier. Time Warner is a facilities-based competitive 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. Thus, the interests of Time Warner Telecom may or will be substantially affected by any decision regarding anti-competitive practices of Verizon Florida, Inc.

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 27th<sup>th</sup> day of August, 2001.



**PETER M. DUNBAR, ESQ.**

Fla. Bar No. 146594

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

**CERTIFICATE OF SERVICE**  
**DOCKET NO. DOCKET 011076-TP**

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

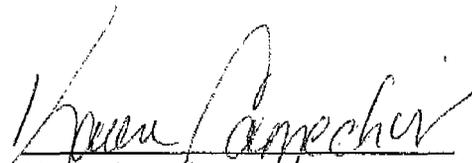
has been served by U.S. Mail on this 27<sup>th</sup> day of August 2001, to the following parties of record:

Florida Cable Telecommunications Assoc., Inc.  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Florida Public Telecommunications Assoc.  
Angela Green, General Counsel  
2292 Wednesday Street  
Tallahassee, FL 32308-4334

Messer Law Firm  
Norman H. Horton, Jr.  
P.O. Box 1876  
Tallahassee, FL 32302  
Phone: 850-222-0720

Verizon Florida Inc.  
Ms. Michelle A. Robinson  
c/o Mr. David Christian  
Tallahassee, FL 32301-7704

  
**Karen M. Camechis**