

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 011075 -T Filed: August 27, 2001 RECEIVED FPSC

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

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)

(850) 222-2126 (facsimile)

CTR
ECR
E-mail: Pete@penningtonlawfirm.com

E-mail: Karen@penningtonlawfirm.com

E-mail: Karen@penningtonlawfirm.com

RGO
SEC
SER
OTH

PAI

PAI

PRODUCT

SER
OTH

PAI

PRODUCT

PAI

FPSC-BUREAU OF

APP

CAF

DOCUMENT NUMBER - DATE

10679 AUG 27 =

FPSC-COMMISSION CLERK

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 such services within territories in which Sprint-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 anticompetitive practices of Sprint-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 27thth day of August, 2001.

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.

CERTIFICATE OF SERVICE DOCKET NO. DOCKET 011075-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 27thth 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

Sprint-Florida, Incorporated Mr. F. B. (Ben) Poag (MC FLTLHO0107) Tallahassee, FL 32316-2214

KAREN M. ÇAMECHIS