

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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AUG 29 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

_____)
 In the Matter of)
)
 Policy and Rules Concerning the Interstate)
 Interexchange Marketplace)
)
 Implementation of Section 254(g) of the)
 Communications Act of 1934, as amended,)
)
 Time Warner Telecom Inc. Petition for Further)
 Extension of Time to File Initial Certification)
 of Compliance with Section 254(g) of the)
 Communications Act of 1934)
)
 _____)

CC Docket No. 96-61

PETITION FOR FURTHER EXTENSION OF TIME

Time Warner Telecom Inc. ("Time Warner Telecom"), by its attorneys, respectfully requests that the Commission extend the time for it to file its initial certification of compliance with Section 254(g) of the Communications Act of 1934, as amended (47 U.S.C. § 254(g)) from September 1, 2001 through and including January 31, 2002, and, in support of that request, states as follows:¹

On February 28, 2001, Time Warner Telecom filed a petition for extension of time asking that its deadline for certification of compliance with the rate integration requirement of Section 254(g) of the Act be extended from August 1, 2001 until September 1, 2001. As explained in that petition, Time Warner Telecom needed that additional time to complete the integration of its network, billing systems, and pricing structures with those of GST Telecommunications, Inc.,

¹ A Declaration of Donald F. Shephard, Time Warner Telecom's Vice President, Federal Regulatory Affairs, is attached to this Petition.

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whose assets Time Warner Telecom acquired out of bankruptcy in January 2001. That petition for extension of time was granted March 29, 2001.²

Despite its best efforts and its commitment of substantial resources to the prompt completion of the consolidation of the assets acquired from GST with those of Time Warner Telecom, this process has taken somewhat longer than initially anticipated. Presently, Time Warner Telecom is utilizing two billing platforms provided to it by two separate third party vendors. One of those platforms is used to generate bills to the majority of Time Warner Telecom's customer base. The other platform – provided by a different vendor – had been used by GST prior the acquisition of that company's assets by Time Warner Telecom, and is still being used to generate bills to those customers obtained by Time Warner Telecom as part of the GST asset acquisition. Many of those former GST customers are located in states where Time Warner Telecom had not provided service prior to its acquisition of the GST assets.

Migration of those former GST customers to the Time Warner Telecom billing platform is among the company's highest priorities. Not only will completion of that migration process enable Time Warner Telecom to provide service to all of its customers pursuant to a consolidated rate structure, it will enable the company to realize considerable operating efficiencies. It will also increase interstate toll service revenues as Time Warner Telecom's interstate toll rates are slightly higher than the rates charged by it to those customers acquired from GST.³

Completion of this system's integration process has been more difficult, more costly and more time-consuming than initially anticipated at the time of filing the petition for extension of

² The petition was granted per the "grant stamp" of Jane E. Jackson, Chief, Competitive Pricing Division, Common Carrier Bureau, March 29, 2001.

³ As noted in the initial petition for extension of time, these rate differences are modest. Former GST customers are charged \$0.0780 per minute for interstate toll calls, whereas Time Warner Telecom's other customers are charged \$0.0825 per minute – a per minute difference of less than a half cent (\$0.0045).

time. Time Warner Telecom now plans to complete this process by end of year 2001. Following the final run of invoices generated by the former GST billing system on November 30, 2001, those customers served by that system will be converted to the system which has been used by Time Warner Telecom. The first billing of former GST customers under the combined system will occur on or about January 1, 2002. In order to enable Time Warner Telecom to perform the necessary testing and to ensure that the combined system is operating as expected, it hereby requests that it be afforded until January 30, 2001 to certify its compliance with Section 254(g) of the Act. In view of the fact that the rate differences for interstate services between those former GST states now served by Time Warner Telecom and the other states served by Time Warner Telecom are slight, grant of this request for a modest additional extension of time will serve the public interest.

Respectfully submitted,

TIME WARNER TELECOM INC.



Mitchell F. Brecher
GREENBERG TRAUIG, LLP
800 Connecticut Avenue, NW
Washington, DC 20006
Telephone (202) 331-3100
Facsimile (202) 331-3101

Its Attorneys

August 29, 2001

DECLARATION

I, Donald F. Shepherd, having personal knowledge of the following, make this Declaration pursuant to 47 C.F.R. §§ 1.16 and 1.726(c).

1. I am employed with Time Warner Telecom Inc. ("Time Warner Telecom") as Vice President, Federal Regulatory Affairs.

2. I am providing this Declaration in support of Time Warner Telecom's Petition for Further Extension of Time.

3. I have reviewed the Petition, including all factual allegations contained therein. To the best of my personal knowledge and belief, all facts alleged in the Petition are true and correct.

4. I declare under penalty of perjury that the foregoing is true and correct.



Executed on: Aug. 29, 2001

CERTIFICATE OF SERVICE

I, Michelle D. Diedrick, certify that on the 29th day of August, 2001, I have caused to be served by hand delivery, a true copy of the foregoing Petition for Extension of Time upon the following:

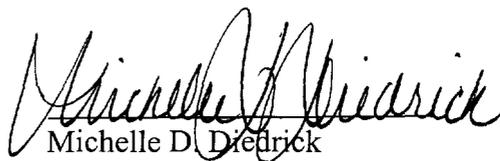
Ms. Dorothy Attwood, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW -- 5-C450
Washington, D.C. 20554

Ms. Jane Jackson, Chief
Competitive Pricing Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW -- 5-C450
Washington, D.C. 20554

Mr. Richard Lerner
Competitive Pricing Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW -- 5-C450
Washington, D.C. 20554

Mr. Jeffrey Carlisle, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

ITS
Federal Communications Commission
445 12th Street, SW -- CY-B400
Washington, DC 20554


Michelle D. Diedrick