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November 7, 2008

VIA ELECTRONIC FILING

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: Time Warner Cable Information Services Application to Amend its Certificate to Provide Telephone Services in the Service Area of *Farmers Telephone Cooperative, Inc.*
Docket No. 2008-325-C

Dear Mr. Terreni:

Enclosed for filing please find Time Warner Cable Information Services' 2nd Discovery Requests to Farmers Telephone Cooperative, Inc. in the above referenced docket. By copy of this letter we are serving the same on counsel for Farmers' Telephone Cooperative by hand delivery. Should you have any questions, please contact me.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
Enclosures

cc/enc: Julie Patterson Laine (via email)
Ms. Charlene Keys (via email)
M. John Bowen, Jr., Esquire (via hand delivery & email)
Margaret M. Fox, Esquire (via hand delivery & email)
Nanette S. Edwards, Esquire (via email & U.S. Mail)
Jeffrey M. Nelson, Esquire (via email & U.S. Mail)

STATE OF SOUTH CAROLINA

In Re: Application of Time Warner Cable Information Services (South Carolina) LLC, d/b/a Time Warner Cable to Amend its Certificate of Public Convenience and Necessity to Provide Telephone Services in the Service Area of Farmers Telephone Cooperative, Inc. and for Alternative Regulation

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2008-325-C

(Please type or print)

Submitted by: Frank R. Ellerbe, III

SC Bar Number: 1866

Address: Robinson, McFadden & Moore, P.C.
PO Box 944
Columbia, SC 29202

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
☐ Electric	☐ Affidavit	☐ Letter	☐ Request
☐ Electric/Gas	☐ Agreement	☐ Memorandum	☐ Request for Certificatio
☐ Electric/Telecommunications	☐ Answer	☐ Motion	☐ Request for Investigatior
☐ Electric/Water	☐ Appellate Review	☐ Objection	☐ Resale Agreement
☐ Electric/Water/Telecom.	☐ Application	☐ Petition	☐ Resale Amendment
☐ Electric/Water/Sewer	☐ Brief	☐ Petition for Reconsideration	☐ Reservation Letter
☐ Gas	☐ Certificate	☐ Petition for Rulemaking	☐ Response
☐ Railroad	☐ Comments	☐ Petition for Rule to Show Cause	☐ Response to Discovery
☐ Sewer	☐ Complaint	☐ Petition to Intervene	☐ Return to Petition
☒ Telecommunications	☐ Consent Order	☐ Petition to Intervene Out of Time	☐ Stipulation
☐ Transportation	☒ Discovery	☐ Prefiled Testimony	☐ Subpoena
☐ Water	☐ Exhibit	☐ Promotion	☐ Tariff
☐ Water/Sewer	☐ Expedited Consideration	☐ Proposed Order	☐ Other:
☐ Administrative Matter	☐ Interconnection Agreement	☐ Protest	
☐ Other:	☐ Interconnection Amendment	☐ Publisher's Affidavit	
	☐ Late-Filed Exhibit	☐ Report	

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2008-325-C

IN RE: Application of Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable to amend its Certificate of Public Convenience and Necessity to Provide Telephone Services in the Service Area of Farmers Telephone Cooperative, Inc. and for Alternative Regulation	)))))))	**TIME WARNER CABLE INFORMATION SERVICES 2nd DISCOVERY REQUESTS TO FARMERS TELEPHONE COOPERATIVE, INC.**

Pursuant to 26 S.C. Regs. 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable ("Time Warner Cable" or "Applicant") requests that Farmers Telephone Cooperative, Inc. ("FTC" or "Company") respond to the following interrogatories and/or requests for production within twenty days of service:

NO. 2-1

Please provide the underlying trial balances or general ledger reports that support the Company's Balance Sheets (or Statement of Financial Position), Income Statements (or Statements of Revenue and Expenses), and Statements of Cash Flow by individual general ledger account for each of the years 2003 – 2007. The requested schedules should be provided in a fully executable Microsoft Excel workbook that includes the Part 64 allocation between regulated and non-regulated operations and the Part 36 allocations between inter and intrastate jurisdictions.

NO. 2-2

Please identify the general ledger accounts that comprise each line item in the Balance Sheets and Income Statements included in the Company's Telecommunications Company Annual Report filed with the South Carolina Office of Regulatory Staff and/or the Public Service Commission of South Carolina for the years 2003 – 2007.

NO. 2-3

Please identify which general ledger account the Company records its South Carolina and federal USF receipts in to the extent the Company receives USF support.

NO. 2-4

To the extent the Company has any loans outstanding from the Rural Utilities Service' Expedited Telecommunications Loan and Loan Guarantee Program and/or the USDA Rural Development Telecommunications Program either under its Traditional Telephone Loan program or Broadband Access Loan program, please provide the original amount of the loan or loans, the stated interest rate or rates on the loans, and a description of the projects the funds were used to finance. The Company's response should differentiate between loans used to support projects for the regulated and non-regulated operations of the Company.

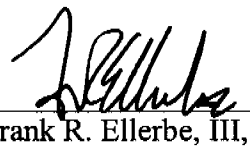
Dated this ___7th___ day of November, 2008.

Respectfully submitted,

C. Bradley Hutto, Esquire
Williams & Williams
Post Office Box 1084
Orangeburg, South Carolina 29115
cbhutto@williamsattys.com
Telephone 803-534-5218
Facsimile 803-536-6544

and

ROBINSON, MCFADDEN & MOORE, P.C.



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Attorneys for Time Warner Cable Information Services, (South Carolina), LLC

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-325-C

In Re: **Application of Time Warner Cable Information Services (South Carolina) LLC, d/b/a Time Warner Cable to Amend its Certificate of Public Convenience and Necessity to Provide Telephone Services in the Service Area of Farmers Telephone Cooperative, Inc. and for Alternative Regulation**	))))))))))	**CERTIFICATE OF SERVICE**

This is to certify that I, Leslie Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Time Warner Cable Information Services 2nd Discovery Requests to Farmers Telephone Cooperative, Inc.** in the foregoing matter by causing a copy of same to be delivered as follows:

VIA HAND DELIVERY
M. John Bowen, Jr. Esquire
Margaret M. Fox, Esquire
McNair Law Firm, PA
1301 Gervais Street
Columbia, South Carolina 29201

VIA US MAIL
Nanette S. Edwards, Esquire
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
P.O. Box 11263
Columbia, SC 29211

Dated at Columbia, South Carolina this 7th day of November, 2008.

Leslie Allen

Leslie Allen