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May 24, 2006

FILED ELECTRONICALLY
HAND DELIVERED ORIGINAL

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 - Complaints
Docket No. 2005-402-C, 2005-403-C, 2005-404-C,
2005-405-C, & 2005-406-C,

Dear Mr. Terreni:

Enclosed for filing please find Time Warner Cable Information Services (South Carolina), LLC's Motion for Summary Disposition on the issue of whether St. Stephen Telephone Co.; Farmers Telephone Cooperative, Inc.; Home Telephone Co.; PBT Telecom, Inc.; and Ft. Mill Telephone Co. are required to negotiate with TWCIS. By copy of this letter we are serving the same on all parties of record. Please stamp the extra copy provided and return it with our courier. Should you need additional information, please contact me.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
Enclosure
cc/enc: Julie Y. Patterson, Senior Counsel (via email & U.S. Mail)
Nanette Edwards, Staff Attorney ORS (via email & U.S. Mail)
Jeffrey M. Nelson, Staff Attorney ORS (via email & U.S. Mail)
John Bowen, Jr. Esquire (via email & U.S. Mail)
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THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket Nos.
2005-402-C, 2005-403-C, 2005-404-C, 2005-405-C, and 2005-406-C

In re: Docket No. 2005-402-C Time Warner Cable Information Services (South Carolina), LLC, Complainant/ Petitioner, vs. St. Stephen Telephone Company, Defendant/Respondent	)	
In re: Docket No. 2005-403-C Time Warner Cable Information Services (South Carolina), LLC, Complainant/ Petitioner, vs. Farmers Telephone Cooperative, Inc., Defendant/Respondent	)	**TIME WARNER CABLE INFORMATION SERVICES (SOUTH CAROLINA) , LLC, MOTION FOR SUMMARY DISPOSITION**
In re: Docket No. 2005-404-C Time Warner Cable Information Services (South Carolina), LLC, Complainant/Petitioner, vs. Home Telephone Co., Inc., Defendant/Respondent.	)	

In re: Docket No. 2005-405-C	)
	)
Time Warner Cable Information Services (South Carolina), LLC,	)
	)
Complainant/ Petitioner,	)
vs.	)
	)
PBT Telecom, Inc.,	)
	)
Defendant/Respondent.	)
	)

In re: Docket No. 2005-406-C	)
	)
Time Warner Cable Information Services (South Carolina), LLC,	)
	)
Complainant/ Petitioner,	)
vs.	)
	)
Ft. Mill Telephone Company,	)
	)
Defendant/Respondent.	)
	)

Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") respectfully submits this motion for summary disposition on the issue of whether St. Stephen Telephone Co. ("St. Stephen"), Farmers Telephone Cooperative, Inc. ("Farmers"); Home Telephone Company, Inc. ("Home");PBT Telecom, Inc. ("PBT"), and Fort Mill Telephone Co. ("Ft. Mill") (collectively the "ILECs") are required to negotiate with TWCIS pursuant to the Telecommunications Act of 1996 and in accordance with the previous ruling of the Public Service Commission of South Carolina ("Commission"). As explained below, there are no genuine issues as to any material fact and TWCIS is entitled to judgment as a matter of law on this issue.

SUMMARY OF TWCIS POSITION

TWCIS has attempted to commence negotiations with the ILECs for interconnection pursuant to Sections 251(a), 251(b), and 251(c) of the federal Communications Act of 1934, as amended ("Federal Act"). 47 U.S.C. §§ 251(a), (b), (c). The ILECs have refused to negotiate for interconnection in their service areas on several legal grounds, contending (1) that TWCIS is not certificated in the service areas of the ILECs; (2) that TWCIS is not a "telecommunications carrier" entitled to interconnection pursuant to Section 251; and (3) that the ILECs are not required to interconnect because of federal rural exemption, 47 U.S.C. § 251(f)(1). The ILECs' position directly conflicts with the Commission's *Order No. 2005-412* in which the Commission ruled that TWCIS has the ability as a "telecommunications carrier" under Section 251 to enter into negotiations for an interconnection agreement with Home. *Order 2005-412*, p. 6, ¶ 1.

TWCIS understands that the ILECs have asked the Commission to stay this proceeding pending a decision of the Federal Communications Commission ("FCC") on the Petition for Preemption filed by TWCIS. WC Docket No. 06-54, *Petition of Time Warner Cable for Preemption Pursuant to Section 253 of the Communications Act, as Amended*, Petition for Preemption (filed March 1, 2006). The issue for which TWCIS seeks summary judgment, however, is not implicated by the pending Petition for Preemption, and thus, the Commission may act on TWCIS' motion notwithstanding the request for stay made by the ILECs.

Summary judgment is appropriate in this case as there is no genuine issue of material fact and TWCIS is entitled to judgment as a matter of law. *City of Columbia v. American Civil Liberties Union*, 323 S.C. 384, 475 S.E.2d 747 (Sup. Ct. 1996). Based on the pleadings and documents submitted, the facts in this proceeding are not in dispute. Thus, TWCIS requests that the Commission grant TWCIS' Motion for Summary Disposition by affirming its prior ruling

that TWCIS is entitled to negotiate an interconnection arrangement with the ILECs without the need for further certification from the Commission.

FACTUAL BACKGROUND

TWCIS was granted a certificate of public convenience and necessity to provide service in certain areas of South Carolina in *Order No. 2004-213*, Docket No. 2003-362-C, May 24, 2004. In October 2004, TWCIS returned to the Commission requesting permission to provide service in certain areas carved out from its initial authorization including the ILECs' service areas. TWCIS simultaneously filed a separate application requesting permission to provide service in ALLTEL's service area. In these two subsequent dockets, TWCIS requested that it be authorized to provide the same kind of competitive voice service as TWCIS currently is authorized to provide under the first certification *Order*. The *Order* in the ILECs' docket provided

> The application of TWCIS originally sought an expanded Certificate of Public Convenience and Necessity to serve the service areas of the denominated rural local exchange carriers (the ILECs). At the hearing, TWCIS stated its desire to possess the expanded certificate so that it could enter into interconnection agreements with the rural LECs, and then serve a non-regulated Time-Warner subsidiary as a wholesale. No expansion of the Company's Certificate is needed for it to enter into negotiations with the RLECs. The *Company possesses this ability as a telecommunications carrier* under Section 251 of the Telecommunications Act of 1996 and no further blessing of this Commission is needed for this undertaking.

Order No. 2005-412, p. 6, ¶ 1 (emphasis added).

On July 29, 2005, TWCIS submitted a bona fide request for interconnection to each of the ILECs pursuant to Sections 251(a), (b), and (c) and 252 of the Federal Act. *See* attached Exhibit 1. On October 19, 2005, counsel for Home, PBT, and Fort Mill responded indicating that Home, PBT, and Fort Mill "will negotiate with TWCIS pursuant to the applicable state and federal rules and regulations. As such, Home, PBT, and Fort Mill have engaged Lans Chase of

the consulting firm John Staurulakis, Inc. ("JSI") to negotiate with TWCIS on behalf of Home PBT, and Fort Mill. Mr. Chase is in the process of preparing a proposed agreement and will send it to you for your review and consideration." *See* attached Exhibit 2.

TWCIS has both informally and formally requested a proposed interconnection agreement from JSI. TWCIS subsequently sent a letter to the ILECs' counsel on December 14, 2005, requesting notification as to whether the ILECs intended to move forward with negotiations. *See* attached Exhibit 3. By letter dated December 16, 2005, the ILECs responded – through their consultant – that they would continue discussions in respect to telecommunications areas where TWCIS is a certified telecommunications carrier, but the ILECs refused to negotiate on an interconnection agreement in their own service areas "because TWCIS does not appear to be a telecommunications carrier in the areas of the state served by the RLEC." *See* attached Exhibit 4. The ILECs have not denied the existence or authenticity of the documents referenced above, and the contents of the documents speak for themselves. *See* the ILECs' Answer, p. 2, ¶ 8.

Under South Carolina and federal law, TWCIS is operating as a telecommunications carrier. It is a matter of public record that on December 14, 2005, due to the unsettled nature of the issues surrounding the appropriate regulatory treatment of voice over Internet Protocol ("VoIP") services, counsel for TWCIS provided written confirmation to the Commission that TWCIS had not withdrawn or deleted the retail portion of its S.C. Tariff No. 1 Applicable to Packaged Local and Interexchange IP Voice Services filed June 4, 2004. The notice also confirmed that TWCIS intends to continue to offer its Digital Phone service in South Carolina on a regulated basis through its S.C. Tariff No. 1 currently on file. *See* Exhibit 5. TWCIS operates pursuant to that tariff today.

ARGUMENT

Standard of Review

Because there are no factual issues to present to the Commission on this issue, the limited issue of whether TWCIS is entitled to negotiate with the ILECs consistent with the Commission's prior ruling and the Telecommunications Act of 1996 may be decided as a matter of law. *Spencer v. Miller*, 259 S.C. 453, 192 S.E.2d 863, 864 (1972). The Supreme Court has indicated that when a dispute is not over the underlying facts "but as to the interpretation of the law, and the development of the record will not aid in the resolution of the issues, it is proper to decide even novel issues" without an evidentiary hearing. *Unisys Corp. v. S.C. Budget & Control Board,* 346 S.C. 158, 551, S.E.2d 263, 267 (Sup. Ct. 2001). Further, the FCC has expressly stated that the Commission has the authority to address issues related to whether parties are negotiating agreements in good faith. Specifically, the FCC determined that "state commissions have authority, under section 252(b)(5), to consider allegations that a party has failed to negotiate in good faith." 47 U.S.C. § 252(b)(5); *Implementation of the Local Competition Provisions in the Telecommunications Act 1996; Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers,* 11 FCC Rcd 15499, ¶ 143 (1996) ("*Local Competition Order*") (intervening history omitted); *aff'd by AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. 366 (1999).

The resolution of the issue before the Commission involves an interpretation of the law. Therefore, the Commission can and should address this legal issue via summary disposition, with an opportunity for oral arguments.

Violation of Duty to Negotiate for Interconnection and Other Arrangements

As a matter of law, the ILECs are required to comply with the orders of this Commission finding that TWCIS "possesses [the] ability as a telecommunications carrier . . . to enter into negotiations with the RLECs. *Order No. 2005-412*, p. 6, ¶ 1. In addition, the ILECs are obligated to comply with the duty to interconnect imposed by Section 251(a) of the Federal Act as well as the obligations to provide resale, number portability, dialing parity, access to rights of way, and arrangements for the transport and termination of traffic under Section 251(b) of the Federal Act. 47 U.S.C. §§ 251(a), (b)(2), (b)(5).

To the extent that the ILECs are relying on the unsettled regulatory status of VoIP to argue that they do not have an obligation to interconnect with TWCIS, the ILECs' position is at odds with the explicit orders of this Commission finding that TWCIS possesses interconnection rights under Section 251. The Commission granted TWCIS a certificate of public convenience and necessity to provide competitive, facilities-based intrastate local and interexchange voice *telecommunications services* within the state of South Carolina subject to the stipulation with the South Carolina Telephone Coalition in *Order No. 2004-213*, p. 17, ¶ 1. The ILECs later supported the Commission's ruling in *Order 2005-412* that TWCIS is not required to be certified in order to negotiate an interconnection agreement. *See* RLEC's Answer to TWCIS Petition for Judicial Review ¶¶ 14, 18, attached as Exhibit 6. Thus, the ILECs should be judicially estopped from refusing to negotiate with TWCIS .

As a registered telecommunications carrier with the FCC, TWCIS also possesses rights under Sections 251(a) and 251(b). *See* 499 Filer ID 824498, *available at* http://gullfoss2.fcc.gov/cib/form499/499detail.cfm?FilerNum=824498 attached as Exhibit 7. An ILEC's Section 251(a) and 251(b) obligations are in addition to the obligations set forth in

Section 251(c) *See Local Competition Order* ¶ 1241. As explained in more detail below, the obligations in Sections 251 (a) and (b) apply to all telecommunications carriers and local exchange carriers without regard to whether a carrier is entitled to the rural exemption under Section 251(f)(1). *See Number Portability Order* ¶ 117.

Specifically, Section 251(a) of the Federal Act imposes the duty on each telecommunications carrier:

> (1) to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers; and
> (2) not to install network features, functions, or capabilities that do not comply with the guidelines and standards established pursuant to section 255 or 256 of [the Federal Act].

47 U.S.C. § 251(a). Under the FCC's rules, "interconnection" is defined as "the linking of two networks for the mutual exchange of traffic." 47 C.F.R. § 51.5. Section 251(a)'s interconnection obligations apply to all telecommunications carriers without exception.

The FCC has determined that telecommunications carriers may interconnect under Section 251(a) or Section 251(c)(2). *Local Competition Order* ¶ 995. The FCC's rules describe the respective interconnection duties under Section 251(a) and Section 251(c). For example, Rule 51.100 is the interconnection duty that is applicable to all telecommunications carriers and replicates the requirements set forth in Section 251(a) of the Federal Act. 47 C.F.R. § 51.100. In contrast, Rule 51.305 defines the interconnection duties specifically applicable to ILECs when interconnection under Section 251(c) is triggered. 47 C.F.R. 51.305. TWCIS merely seeks its rights to interconnect under Section 251(a), consistent with the FCC's conclusion that telecommunications carriers "should be permitted to provide interconnection pursuant to section 251(a) either directly or indirectly, based upon their most efficient technical and economical

choices." *Developing a Unified Intercarrier Compensation Regime*, 20 FCC Rcd 15030, ¶ 128 (2005).

TWCIS' interconnection rights under Section 251(a) do not turn on whether TWCIS is certificated in the ILECs' service territories within South Carolina as the ILECs appear to suggest. Rather, TWCIS' right to interconnect under Section 251(a) is established by TWCIS' status as a "telecommunications carrier" providing "telecommunications services." As explained herein, this Commission has found that TWCIS is "a telecommunications carrier under Section 251 of the Telecommunications Act of 1996." *Order No. 2005-412*, p.6, ¶ 1. In addition, TWCIS is itself holding itself out as a telecommunications carrier, as evidenced by its South Carolina tariff and its registration as a provider of telecommunications at the FCC.

The ILECs have no justification for arguing that Section 251 does not apply because TWCIS is not a "telecommunications carrier." This Commission specifically has ruled that TWCIS is a "telecommunications carrier." *Order No. 2005-412*, p.6, ¶ 1. Indeed, even after the release of the FCC's *Vonage Order*, which addressed the authority of state commissions to impose certification requirements on VoIP service providers, the Commission authorized TWCIS to expand its service area to include ALLTEL's service territory. *Order No. 2005-385*, Docket No. 2004-279-C, July 20, 2005; *see also Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission,* 19 FCC Rcd 22404 (2004) ("*Vonage Order*") In the *ALLTEL Order*, the Commission confirmed that TWCIS was authorized to offer interexchange services and *local telecommunications services* noting that TWCIS currently provides facilities-based IP voice service to customers and intends to begin offering services in the ALLTEL service area once it obtains an interconnection agreement. *Order No. 2005-385*, p. 2, 4.

The Commission also reaffirmed that TWCIS is qualified to provide expanded local service to the ALLTEL service area and that TWCIS continues to meet all statutory requirements for the provision of service as a CLEC. *Order No. 2005-385*, p. 5. TWCIS' expanded authority was granted based on testimony describing TWCIS' provision of services as a telecommunications carrier, using the same services and technology currently on file in TWCIS' S.C. Tariff No. 1. *Order No. 2004-279-C*, p. 2. TWCIS has publicly confirmed that it has not withdrawn or deleted the retail portion of its tariff applicable to VoIP services, and intends to continue to offer those services as regulated telecommunications services in the state of South Carolina. *See* Exhibit 5. In fact, TWCIS provides its VoIP services as regulated, tariffed services in South Carolina today.

Violation of Duty to Negotiate in Good Faith

In addition to ignoring the Commission's *Order No. 2005-412*, which held that TWCIS has the ability as a "telecommunications carrier" under Section 251 to enter into negotiations for an interconnection agreement with the ILECs, the ILECs' position violates the FCC's regulations imposing a duty to negotiate in good faith on all ILECs and other carriers requesting agreements under Section 251(b) or Section 251(c). The FCC's rules require both ILECs and competing carriers to negotiate in good faith the terms and conditions of agreements to fulfill the duties established by Section 251(b) and Section 251(c) of the Federal Act. Specifically, the FCC's rules state that:

> (a) An incumbent LEC shall negotiate in good faith the terms and conditions of agreements to fulfill the duties esablished by sections 251(b) and (c) of the Act.
>
> (b) A requesting telecomunications carrier shall negotiate in good faith the terms and conditions of agreements described in paragraph (a) of this section.

(c) If proven to the Commisison, an appropriate state commission, or a court of competent jurisdiction, the following actions or practices, among others, violate the duty to negotiate in good faith: . . .

(4) Conditioning negotiation on a requesting telecommunications carrier first obtaining state certificiation; . . .

(6) Intentionally obstructing or delaying negotiations or resolutions of disputes.

47 C.F.R. §§ 51.301(a), (b), (c). Under the Act and the FCC's implementing regulation cited above, "local exchange carriers ("LECs"), like the [rural telephone companies], have a duty to interconnect with competitors and negotiate agreements in good faith." *Atlas Tel. Co. v. Oklahoma Corp. Comm'n*, 400 F.3d 1256, 1260 (10th Cir. 2005) (citing 47 U.S.C. § 251(a)(1), (c)(1)). The FCC has found that, "[e]ven where there is no specific duty to negotiate in good faith, certain principles or standards of conduct have been held to apply." *Local Competition Order* ¶ 150. The ILECs' continued refusal to negotiate with TWCIS is therefore contrary to law.

The ILECs have not negotiated in good faith and has intentionally obstructed and delayed negotiations. There was no change in TWCIS' status as a telecommunications carrier during the time peiod between the October 19, 2005 letters from the Home, PBT, and Ft. Mill in which they indicated that they would negotiate with TWCIS and the subsequent letter of December 16, 2005 indicating their refusal to negotiate for interconnection. In the December 16th letter, the ILECs further clarified as follows: "While we are willing to continue discussions to negotiate an agreement for the exchange of traffic with TWCIS, particularly with respect to telecommunications services that TWCIS provides *in those areas where it is a certified telecommunications carrier*, we do not believe TWCIS' request falls within Section 251 of the Telecommunications Act because TWCIS does not appear to be a telecommunications carrier in the areas of the state served by the RLECs." *See* Exhibit 4.

Not only does this position conflict with an express ruling of this Commission, but it also conflicts with the FCC's rules and policies. The FCC has imposed the Section 251 duty to negotiate in good faith upon service providers that are subject to neither Section 251(b) (applying only to local exchange carriers) or Section 251(c) (applying only to ILECs). *See Developing a Unified Intercarrier Compensation Regime; T-Mobile et al. Petition for Declaratory Ruling Regarding Incumbent LEC Wireless Termination Tariffs*, 20 FCC Rcd 4855, ¶ 16 (2005) (finding it to be consistent with the underlying purposes of the Act to impose the duty to negotiate in good faith upon wireless carriers). By conditioning negotiation on TWCIS first obtaining state certification to prove it is a "telecommunications carrier," the ILECs have violated not only an order of this Commission, but also the duty to negotiate in good faith pursuant to the FCC's regulations. 47 C.F.R. § 51.301(c)(4).

CONCLUSION

For the reasons set forth, TWCIS respectfully requests that the Commission grant summary disposition on the limited issue of whether TWCIS is entitled to negotiate with the ILECs based on the Commission's prior ruling. The ILECs are required to negotiate with TWCIS in light of the Commission's finding that TWCIS is a "telecommunications carrier" and based on the ILECs' obligations under the Federal Act. Accordingly, this Commission should order the ILECs to do so immediately.

Respectfully submitted this 24th day of May, 2006.

TIME WARNER CABLE INFORMATION SERVICES (SOUTH CAROLINA), LLC

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EXHIBIT 1

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July 29, 2005

VIA HAND DELIVERY

M. John Bowen, Jr., Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Re: Time Warner Cable Information Services (South Carolina), LLC
St. Stephen Telephone Company Interconnection Negotiations

Dear John:

As counsel for and on behalf of Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") and pursuant to Sections 251(a), (b), and (c) and 252 of the Telecommunications Act of 1996, this letter is being sent to you as counsel for St. Stephen Telephone Company ("St. Stephen") to provide notification to St. Stephen that TWCIS intends to engage in interconnection negotiations with St. Stephen for the State of South Carolina. Section 252 specifically sets forth that between the 135th and 160th day after a party has received a request for negotiations under the section, either party may request the Public Service Commission of South Carolina to initiate arbitration proceedings to resolve any open issues. TWCIS will treat the date of this letter as the starting point for determining the arbitration window.

Please contact me at (803)779-8900 upon receipt of this letter to establish a mutually acceptable date, location and agenda for our first meeting. TWCIS is looking forward to opening these interconnection negotiations and reaching closure on our relationship in South Carolina.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
cc: Julie Patterson, Vice President & Chief Counsel (via email)
Ms. Maribeth Bailey (via email)
Ms. Charlene Keys (via email)

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July 29, 2005

VIA HAND DELIVERY

M. John Bowen, Jr., Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Re: Time Warner Cable Information Services (South Carolina), LLC
Farmers Telephone Cooperative, Inc. Interconnection Negotiations

Dear John:

As counsel for and on behalf of Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") and pursuant to Sections 251(a), (b), and (c) and 252 of the Telecommunications Act of 1996, this letter is being sent to you as counsel for Farmers Telephone Cooperative, Inc. ("Farmers") to provide notification to Farmers that TWCIS intends to engage in interconnection negotiations with Farmers for the State of South Carolina. Section 252 specifically sets forth that between the 135th and 160th day after a party has received a request for negotiations under the section, either party may request the Public Service Commission of South Carolina to initiate arbitration proceedings to resolve any open issues. TWCIS will treat the date of this letter as the starting point for determining the arbitration window.

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VIA HAND DELIVERY

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McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Re: Time Warner Cable Information Services (South Carolina), LLC Home Telephone Company, Inc. Interconnection Negotiations

Dear John:

As counsel for and on behalf of Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") and pursuant to Sections 251(a), (b), and (c) and 252 of the Telecommunications Act of 1996, this letter is being sent to you as counsel for Home Telephone Co., Inc. ("Home Telephone") to provide notification to Home Telephone that TWCIS intends to engage in interconnection negotiations with Home Telephone for the State of South Carolina. Section 252 specifically sets forth that between the 135th and 160th day after a party has received a request for negotiations under the section, either party may request the Public Service Commission of South Carolina to initiate arbitration proceedings to resolve any open issues. TWCIS will treat the date of this letter as the starting point for determining the arbitration window.

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M. John Bowen, Jr., Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Re: Time Warner Cable Information Services (South Carolina), LLC
PBT Telecom, Inc. Interconnection Negotiations

Dear John:

As counsel for and on behalf of Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") and pursuant to Sections 251(a), (b), and (c) and 252 of the Telecommunications Act of 1996, this letter is being sent to you as counsel for PBT Telecom, Inc. ("PBT") to provide notification to PBT that TWCIS intends to engage in interconnection negotiations with PBT for the State of South Carolina. Section 252 specifically sets forth that between the 135th and 160th day after a party has received a request for negotiations under the section, either party may request the Public Service Commission of South Carolina to initiate arbitration proceedings to resolve any open issues. TWCIS will treat the date of this letter as the starting point for determining the arbitration window.

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McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Re: Time Warner Cable Information Services (South Carolina), LLC
Fort Mill Telephone Company Interconnection Negotiations

Dear John:

As counsel for and on behalf of Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") and pursuant to Sections 251(a), (b), and (c) and 252 of the Telecommunications Act of 1996, this letter is being sent to you as counsel for Fort Mill Telephone Co. ("Ft. Mill") to provide notification to Ft. Mill that TWCIS intends to engage in interconnection negotiations with Ft. Mill for the State of South Carolina. Section 252 specifically sets forth that between the 135th and 160th day after a party has received a request for negotiations under the section, either party may request the Public Service Commission of South Carolina to initiate arbitration proceedings to resolve any open issues. TWCIS will treat the date of this letter as the starting point for determining the arbitration window.

Please contact me at (803)779-8900 upon receipt of this letter to establish a mutually acceptable date, location and agenda for our first meeting. TWCIS is looking forward to opening these interconnection negotiations and reaching closure on our relationship in South Carolina.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
cc: Julie Patterson, Vice President & Chief Counsel (via email)
Ms. Maribeth Bailey (via email)
Ms. Charlene Keys (via email)

EXHIBIT 2

M. JOHN BOWEN, JR.
jbowen@mcnair.net

MCNAIR LAW FIRM, P.A.

ATTORNEYS AND COUNSELORS AT LAW

www.mcnair.net

BANK OF AMERICA TOWER
1301 GERVAIS STREET, 17th FLOOR
COLUMBIA, SOUTH CAROLINA 29201

POST OFFICE BOX 11390
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE (803)799-9800
FACSIMILE (803)376-2277

October 19, 2005

Frank R. Ellerbe, III, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, South Carolina 29202

Re: Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") Request for Interconnection with Home Telephone Company, Inc. ("Home")

Dear Frank:

This letter is in response to the Time Warner Cable Information Service (South Carolina), LLC ("TWCIS") request to engage in negotiations with Home Telephone Company, Inc. ("Home"). Home will negotiate with TWCIS pursuant to the applicable state and federal rules and regulations. As such, Home has engaged Lans Chase of the consulting firm John Staurulakis, Inc. ("JSI") to negotiate with TWCIS on behalf of Home. Mr. Chase is in the process of preparing a proposed agreement and will send it to you for your review and consideration. In the meantime, should you have questions, please contact me.

Very truly yours,

M. John Bowen, Jr.

MJBjr/bw
cc: H. Keith Oliver

M. JOHN BOWEN, JR.
jbowen@mcnair.net

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ATTORNEYS AND COUNSELORS AT LAW

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FACSIMILE (803)376-2277

October 19, 2005

Frank R. Ellerbe, III, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, South Carolina 29202

Re: Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") Request for Interconnection with PBT Communications, Inc. ("PBT")

Dear Frank:

This letter is in response to the Time Warner Cable Information Service (South Carolina), LLC ("TWCIS") request to engage in negotiations with PBT Communications, Inc. ("PBT"). PBT will negotiate with TWCIS pursuant to the applicable state and federal rules and regulations. As such, PBT has engaged Lans Chase of the consulting firm John Staurulakis, Inc. ("JSI") to negotiate with TWCIS on behalf of PBT. Mr. Chase is in the process of preparing a proposed agreement and will send it to you for your review and consideration. In the meantime, should you have questions, please contact me.

Very truly yours,

M. John Bowen, Jr.

MJBjr/bw
cc: Ben Spearman

M. JOHN BOWEN, JR.
jbowen@mcnair.net

MCNAIR LAW FIRM, P.A.

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TELEPHONE (803)799-9800
FACSIMILE (803)376-2277

October 19, 2005

Frank R. Ellerbe, III, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, South Carolina 29202

Re: Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") Request for Interconnection with Fort Mill Telephone Company ("Fort Mill")

Dear Frank:

This letter is in response to the Time Warner Cable Information Service (South Carolina), LLC ("TWCIS") request to engage in negotiations with Fort Mill Telephone Company ("Fort Mill"). Fort Mill will negotiate with TWCIS pursuant to the applicable state and federal rules and regulations. As such, Fort Mill has engaged Lans Chase of the consulting firm John Staurulakis, Inc. ("JSI") to negotiate with TWCIS on behalf of Fort Mill. Mr. Chase is in the process of preparing a proposed agreement and will send it to you for your review and consideration. In the meantime, should you have questions, please contact me.

Very truly yours,

M. John Bowen, Jr.

MJBjr/bw
cc: Matthew L. Dosch

EXHIBIT 3

ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.
COLUMBIA | GREENVILLE

Frank R. Ellerbe, III
1901 MAIN STREET, SUITE 1200
POST OFFICE BOX 944
COLUMBIA, SOUTH CAROLINA 29202
PH
(803) 779-8900 | (803) 227-1112 *direct*
FAX
(803) 252-0724 | (803) 744-1558 *direct*
fellerbe@robinsonlaw.com

December 14, 2005

VIA EMAIL AND U.S. MAIL

M. John Bowen, Jr., Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Re: Time Warner Cable Information Services (South Carolina), LLC Interconnection Negotiations with Farmers Telephone Cooperative; Home Telephone Co.; Ft. Mill Telephone Co.; PBT Telecom, Inc.; and St. Stephens Telephone Co.

Dear John:

I am writing to follow up on Time Warner Cable Information Services (South Carolina), LLC's July 29, 2005, requests for interconnection negotiations with Farmers Telephone Cooperative; Home Telephone Co.; Ft. Mill Telephone Co.; PBT Telecom, Inc.; and St. Stephens Telephone Co. (collectively, the "ILECs"). On October 19, 2005, you responded by letter on behalf of Home, Fort Mill, and PBT indicating that JSI would be negotiating on behalf of these three companies. To date we have not received a proposed interconnection agreement from JSI for any of these three companies. Farmers and St. Stephens have failed to respond to our requests. During our meeting on November 7th, you indicated that the ILECs would be responding to us soon. You also indicated that St. Stephens was unsure whether Time Warner Cable had facilities in its service area. Time Warner Cable has confirmed that we have facilities in St. Stephens' service area.

Time Warner Cable prefers to negotiate interconnection agreements with the ILECs that protects all parties' interests. However, if your clients are unwilling to engage in negotiations, we request that you notify us of their decision so that we may begin proceedings in the appropriate forum to resolve disputed issues. Since our window for arbitration is now open, please provide us with an interconnection agreement template for those ILECs who are willing to negotiate by Wednesday, December 21, 2005.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
Enclosure

cc/enc: Julie Patterson, Vice President & Chief Counsel (via email)
Ms. Maribeth Bailey (via email)
Ms. Charlene Keys (via email)

EXHIBIT 4

John Staurulakis
INCORPORATED

Brookside Court, Suite 135
4625 Alexander Drive, Alpharetta, GA 30022
phone: 770-569-2105, fax: 770-410-1608

December 16, 2005

Maribeth Bailey
Time Warner Cable Information Services
290 Harbor Drive
Stanford, CT 06902

Re: TWCIS Request for Interconnection with PBT, Home, Farmers, Ft. Mill, and St. Stephen

Maribeth:

We have reviewed the applicable state and federal rules and regulations regarding TWCIS' request for interconnection with PBT Telecom, Inc., Home Telephone Company, Inc., Farmers Telephone Cooperative, Inc., Ft. Mill Telephone Company and St. Stephen Telephone Company (collectively "RLECs"). While we are willing to continue discussions to negotiate an agreement for the exchange of traffic with TWCIS, particularly with respect to telecommunications services that TWCIS provides in those areas where it is a certified telecommunications carrier, we do not believe TWCIS' request falls within Section 251 of the Telecommunications Act because TWCIS does not appear to be a telecommunications carrier in the areas of the state served by the RLECs.

Finally, regarding St. Stephen, have you been able to investigate further where Time Warner Cable actually provides service in St. Stephen territory? I believe we discussed in our last meeting that St. Stephen is not aware of any Time Warner Cable facilities in its service area, and you were going to see if you could provide some more specific information on that.

Sincerely,

J. Lans Chase
John Staurulakis, Inc.

cc: PBT Telecom, Inc.
Home Telephone Company, Inc.
Farmers Telephone Cooperative, Inc.
Ft. Mill Telephone Company
St. Stephen Telephone Company

7852 Walker Drive, Suite 200, Greenbelt, MD 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

Echelon Building II, Suite 200
9430 Research Boulevard, Austin, TX 78759
phone: 512-338-0473, fax: 512-346-8822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

EXHIBIT 5

ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

Frank R. Ellerbe, III
1901 MAIN STREET, SUITE 1200
POST OFFICE BOX 944
COLUMBIA, SOUTH CAROLINA 29202

PH
(803) 779-8900
FAX
(803) 252-0724

December 14, 2005

VIA E-MAIL & HAND DELIVERED

Mr. Charles Terreni, Chief Clerk
Public Service Commission of South Carolina
Synergy Business Park
101 Executive Center Drive, Saluda Building
Post Office Drawer 11649
Columbia, SC 29211

Re: Time Warner Cable Information Services (SC), LLC
Docket Nos. 2003-362-C & 2004-280-C

Dear Mr. Terreni:

This letter serves as written confirmation to the Commission that Time Warner Cable Information Services (SC), LLC ("Time Warner Cable") has not withdrawn or deleted the retail portion of its S.C. Tariff No. 1 Applicable to Packaged Local and Interexchange IP Voice Services filed June 4, 2004. Due to the unsettled nature of the issues surrounding the appropriate regulatory treatment of VoIP services, Time Warner Cable intends to continue to offer its Digital Phone service in South Carolina on a regulated basis through its Tariff currently on file.

Nothing in this letter should be construed as an admission or agreement by Time Warner Cable that the Digital Phone services which it currently offers constitute telecommunications services, local exchange services, common carrier offerings, or services that are otherwise subject to federal or state regulation, nor that the entity or entities providing them constitute telecommunications carriers, telecommunications providers, local exchange carrier, interexchange carriers, common carriers, or other regulated entities. Time Warner Cable specifically reserves its right to contend that the FCC Order, *In the Matter of Vonage Holdings Corp.*, WC Docket No. 03-211, FCC 04-267, released November 12, 2004, preempted state regulation of its Digital Phone services in any proceedings before the Commission, the FCC, or any Court.

Please stamp the extra copy of this letter provided as proof of filing and return it with our courier.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

/bds

cc: Julie Y. Patterson, Esquire (via e-mail & US Mail)
Ms. Charlene Keys (via email & U.S. Mail)
Benjamin P. Mustian, Esquire (via email & U.S. Mail)
Dan F. Arnett, Chief of Staff of ORS (via email & U.S. Mail)
John Bowen, Esquire (via email & U.S. Mail)
Margaret Fox, Esquire (via email & U.S. Mail)
Ms. Daphne Werts (via email)

EXHIBIT 6

STATE OF SOUTH CAROLINA)) COUNTY OF RICHLAND)	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT Civil Action No. 2005-CP-40-5687
Time Warner Cable Information Services (South Carolina), LLC, Petitioner, v. Public Service Commission of South Carolina, Farmers Telephone Cooperative, Inc., Fort Mill Telephone Co., Home Telephone Co. Inc., PBT Telecom, Inc., St. Stephen Telephone Co., South Carolina Telephone Coalition, and Office of Regulatory Staff, Respondents.	**ANSWER OF FARMERS TELEPHONE COOPERATIVE, INC., FORT MILL TELEPHONE CO., HOME TELEPHONE CO., INC., PBT TELECOM, INC., ST. STEPHEN TELEPHONE CO., AND THE SOUTH CAROLINA TELEPHONE COALITION**

Farmers Telephone Cooperative, Inc., Fort Mill Telephone Co., d/b/a Comporium Communications, Inc., Home Telephone Co., Inc., PBT Telecom, Inc., St. Stephen Telephone Co. (collectively "RLECs"), and the South Carolina Telephone Coalition ("SCTC") respectfully submit this Answer to the Petition for Judicial Review of Time Warner Cable Information Services (South Carolina), LLC ("TWCIS"). RLECs and SCTC answer the Petition, and reply to the allegations set forth by TWCIS in its Petition, as follows:

1. RLECs and SCTC deny each and every allegation of the Petition not herein specifically admitted and demand strict proof thereof.

FOR A FIRST DEFENSE

2. Responding to Paragraph 1, RLECs and SCTC admit that the Public Service Commission of South Carolina ("the Commission") issued the named Orders and that this Court has jurisdiction to review final orders issued by the Commission.

3. Responding to Paragraph 2, RLECs and SCTC lack information or belief sufficient to admit or deny that TWCIS is a limited liability company organized under the laws of the State of Delaware. RLECs and SCTC admit that TWCIS currently holds a certificate to provide certain services in specified areas within the State of South Carolina, including the areas served by ALLTEL South Carolina, Inc., but note that the certification is for authority to provide telecommunications services.

4. Responding to the first sentence of Paragraph 3, RLECs and SCTC admit that they are respondents in this appeal, and admit that TWCIS has also named ORS and the Commission as respondents in this appeal, but lack information or belief sufficient to admit or deny that those other entities are proper respondents to this action. RLECs and SCTC admit the remaining allegation contained in Paragraph 3.

5. Responding to Paragraph 4, RLECs and SCTC admit that the Commission is an administrative agency of the State of South Carolina, and refer to S.C. Code Ann. § 58-3-5 *et seq.*, S.C. Code Ann. § 58-9-10 *et seq.*, and S.C. Code Ann. § 58-9-280 for a detailed description of the statutory duties and obligations of the Commission with respect to telephone utilities and issuance of certificates to provide services.

6. Responding to Paragraph 5, RLECs and SCTC admit that ORS is an administrative agency of the State of South Carolina, and refer to S.C. Code Ann. § 58-4-5 *et seq.* for a detailed description of the statutory duties and obligations of ORS with respect to public utilities.

7. RLECs and SCTC admit so much of Paragraph 6 as alleges that TWCIS filed two applications to amend its Certificate, purportedly on October 1, 2004, to provide service in the specified geographical areas. RLECs and SCTC disagree with TWCIS' characterization that the RLECs "opposed" the application, but admit that they asked the Commission to deny the

application, as filed, due to the ambiguity of the request, and because granting the application would not serve the public interest. RLECs and SCTC lack information or belief sufficient to admit or deny the nature of ALLTEL's position upon TWCIS' application relating to service in areas being served by ALLTEL.

8. With respect to the allegations contained in Paragraph 7, RLECs and SCTC aver that Commission Order 2005-385, including the findings and conclusions contained therein, speaks for itself.

9. RLECs and SCTC admit the allegation contained in Paragraph 8 to the extent that the Commission issued Order No. 2005-412 on August 1, 2005, denying TWCIS' application.

10. RLECs and SCTC admit so much of Paragraph 9 as alleges that TWCIS filed a petition for rehearing or reconsideration of Order No. 2005-412 and that the petition was purported to have been filed pursuant to S.C. Code Ann. § 58-9-1200 and 26 S.C. Regs. 103-836. RLECs and SCTC admit that the Commission denied TWCIS' petition for reconsideration in Order No. 2005-484, but lack information or belief sufficient to admit or deny the date of the receipt of such Order and, therefore, deny same.

11. RLECs and SCTC deny the allegations contained in Paragraph 10.

12. RLECs and SCTC deny the allegations contained in Paragraph 11.

13. Responding to Paragraph 12, RLECs and SCTC crave reference to Commission Order No. 2005-412 for the specific grounds cited by the Commission in denying TWCIS' application in that matter. RLECs and SCTC deny the remaining allegation.

14. Responding to the first sentence of Paragraph 13, RLECs and SCTC crave reference to the specific language within the Commission's Orders, but deny that the Commission's Orders denying TWCIS' original application and dismissing its modified application were in error. RLECs and SCTC deny the remaining allegations.

15. Responding to Paragraph 14, RLECs and SCTC admit that TWCIS' application was filed in October and that the *Vonage* order was issued in November (of 2004). Ms. Patterson's testimony and the record of the proceeding speak for themselves. RLECs and SCTC deny the remaining allegations contained in Paragraph 14.

16. RLECs and SCTC admit so much of Paragraph 15 as alleges that the Commission issued the named Orders granting TWCIS authority to provide certain services, but deny that any previously-filed applications "mirror" the requests contained in the application at issue in this matter. Moreover, the provision of services by TWCIS at issue in Order No. 2004-213 was subject to a stipulation entered into with SCTC, which provided that TWCIS would only seek to serve customers in areas in which the telephone company did not currently have a rural exemption. RLECs and SCTC admit that the Commission certificated TWCIS in ALLTEL's service area and crave reference to the pertinent Commission Order for the grounds relied upon by the Commission in issuing its Order. RLECs and SCTC deny the remaining allegations contained in Paragraph 15.

17. RLECs and SCTC deny the allegations contained in Paragraph 16.

18. RLECs and SCTC crave reference to the particular statutory provisions cited in Paragraph 17 for the accuracy of any citations or quotations, but deny that the Commission was erroneous in its interpretation of such provisions. RLECs and SCTC deny the remaining allegations contained in Paragraph 17.

19. Responding to the allegation contained in the first sentence of Paragraph 18, RLECs and SCTC deny that the Commission's Order is erroneous "as a practical matter," and further disagree with TWCIS' characterization of testimony presented on behalf of RLECs and SCTC and, therefore, deny same. RLECs and SCTC crave reference to the particular Agreements and filings cited by TWCIS for the accuracy of any citations or quotations, but deny

that they apply to the issues in this case. RLECs and SCTC deny the remaining allegations contained in Paragraph 18.

20. Responding to the allegations contained in Paragraph 19, RLECs and SCTC admit that the *Vonage* order is currently under appeal. RLECs and SCTC deny the remaining allegations.

21. Responding to Paragraph 20, RLECs and SCTC crave reference to the particular statutory provisions cited by TWCIS for the accuracy of any citations or quotations, but deny that such law applies in this case. With respect to the reference quoting specific language in Order No. 2005-412, RLECs and SCTC admit that the language substantially quotes accurately the Order, but disagree with TWCIS' characterization relating to such language and, therefore, deny same. RLECs and SCTC note that the specific language of Order No. 2005-412 as cited by TWCIS was not emphasized in any manner in the original Order. RLECs and SCTC deny the remaining allegations contained in Paragraph 20. RLECs and SCTC further note that although the Commission in Order No. 2005-412 referenced a discussion to rural exemption waivers, the Commission nevertheless clarified its position in its subsequent Order Denying Rehearing or Reconsideration (Order No. 2005-484) by stating that the companies' rural exemptions were not an issue in the proceeding and that Order No. 2005-412 should not be read as a ruling on a waiver of a rural exemption.

22. Responding to Paragraph 21, RLECs and SCTC deny that Order No. 2005-412 violates 47 U.S.C.A. § 253(a) of the federal Telecommunications Act. RLECs and SCTC crave reference to the particular decisions and cases cited for the accuracy of any citations or quotations, but deny that such law applies in this case and further deny the remaining allegations contained in Paragraph 21.

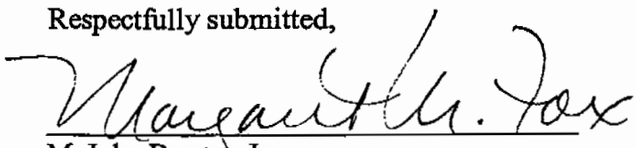
FOR A SECOND DEFENSE

23. The responses set forth in Paragraphs 1-22 above are reasserted as if set forth fully herein and are incorporated hereby by reference.

24. TWCIS has failed to state a cause of action against RLECs and SCTC upon which relief may be granted and TWCIS' Petition should, therefore, be dismissed.

WHEREFORE, having fully answered the Petition for Judicial Review, RLECs and SCTC respectfully request that the Court deny the relief sought by TWCIS in its Petition for the reasons stated herein and accordingly dismiss the Petition for Judicial Review, and that the Court order such other and further relief as is just and proper.

Respectfully submitted,



M. John Bowen, Jr.
Margaret M. Fox
Sue-Ann Gerald Shannon
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
Tel: (803) 799-9800
Fax: (803) 753-3219
Email: jbowen@mcnair.net; pfox@mcnair.net; sshannon@mcnair.net

Attorneys for Farmers Telephone Cooperative, Inc., Fort Mill Telephone Co., d/b/a Comporium Communications, Inc., Home Telephone Co., Inc., PBT Telecom, Inc., St. Stephen Telephone Co., and the South Carolina Telephone Coalition

November 30, 2005

Columbia, South Carolina.

EXHIBIT 7

CGB - Form 499A Search Results Detailed Information

FCC Form 499-A Telecommunications Reporting Worksheet

DETAILED INFORMATION

Filer Identification Information:

499 Filer ID Number:	**824498**
Registration Current as of:	**4/1/2004**
Legal Name of Reporting Entity:	**Time Warner Cable Information Service (South Ca**
Doing Business As:	**Time Warner Cable**
Principal Communications Type:	**CAP/LEC**
Universal Service Fund Contributor:	**No**
(Contact USAC at 888-641-8722 if	this is not correct.)
Holding Company:	**Time Warner Entertainment.Advance Newhouse Part**
Registration Number (CORESID):	**0011-0100-55**
Management Company:	
Headquarters Address:	**290 Harbor Dr.**
City:	**Stamford**
State:	**CT**
ZIP Code:	**06902**
Customer Inquiries Address:	**290 Harbor Dr.**
City:	**Stamford**
State:	**CT**
ZIP Code:	**06902**
Customer Inquiries Telephone:	**866-892-7201**
Other Trade Names:	

Agent for Service of Process:

Local/Alternate Agent for Service of Process:	
Telephone:	
Extension:	
Fax:	
E-mail:	
Business Address of Agent for Mail or Hand Service of Documents:	
City:	
State:	
ZIP Code:	

D.C. Agent for Service of Process:	**CT Corporate Systems**
Telephone:	**202-393-1747**
Extension:	
Fax:	**202-393-1760**
E-Mail:	
Business Address of D.C. Agent for Mail or Hand Service of Documents:	
City:	
State:	
ZIP Code:	

FCC Registration Information:

Chief Executive Officer:	**Carl U.J. Rossetti**
Business Address:	**290 Harbor Dr.**
City:	**Stamford**
State:	**CT**
ZIP Code:	**06902**
Chairman or Other Senior Officer:	**Wayne Knighton**
Business Address:	**290 Harbor Dr.**
City:	**Stamford**
State:	**CT**
ZIP Code:	**06902**
President or Other Senior Officer:	**Gerald Campbell**
Business Address:	**290 Harbor Dr.**
City:	**Stamford**
State:	**CT**
ZIP Code:	**06902**

Jurisdictions in Which the Filing Entity Provides Telecommunications Services:

South Carolina

Return to Search Form

Use browser "Back" button to return to results page.

last reviewed/updated on 11/22/05

Federal Communications Commission
445 12th Street SW
Washington, DC 20554
More FCC Contact Information...

Phone: 1-888-CALL-FCC (1-888-225-5322)
TTY: 1-888-TELL-FCC (1-888-835-5322)
Fax: 1-866-418-0232
E-mail: fccinfo@fcc.gov

- Privacy Policy
- Website Policies & Notices
- Required Browser Plug-ins
- Freedom of Information Act

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket Nos.
2005-402-C, 2005-403-C, 2005-404-C, 2005-405-C, and 2005-406-C

In re: Docket No. 2005-402-C Time Warner Cable Information Services (South Carolina), LLC, Complainant/ Petitioner, vs. St. Stephen Telephone Company, Defendant/Respondent	**CERTIFICATE OF SERVICE**
In re: Docket No. 2005-403-C Time Warner Cable Information Services (South Carolina), LLC, Complainant/ Petitioner, vs. Farmers Telephone Cooperative, Inc., Defendant/Respondent	
In re: Docket No. 2005-404-C Time Warner Cable Information Services (South Carolina), LLC, Complainant/Petitioner, vs. Home Telephone Co., Inc., Defendant/Respondent.	

In re: Docket No. 2005-405-C	)
	)
Time Warner Cable Information Services (South Carolina), LLC,	)
	)
Complainant/ Petitioner,	)
vs.	)
	)
PBT Telecom, Inc.,	)
	)
Defendant/Respondent.	)
	)

In re: Docket No. 2005-406-C	)
	)
Time Warner Cable Information Services (South Carolina), LLC,	)
	)
Complainant/ Petitioner,	)
vs.	)
	)
Ft. Mill Telephone Company,	)
	)
Defendant/Respondent.	)
	)

This is to certify that I, Toni Hawkins, a paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Time Warner Cable Information Services (South Carolina), LLC's Motion for Summary Disposition** in the foregoing matter by email and by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Nanette S. Edwards, Staff Attorney
Jeffrey M. Nelson, Staff Attorney
Office of Regulatory Staff
P.O. Box 11263
Columbia, SC 29211

John Bowen, Jr., Esquire
Margaret Fox, Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Dated at Columbia, South Carolina this 24th day of May, 2006.

Toni Hawkins

Toni Hawkins