McWhirter Reeves

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PLEASE REPLY TO:

TALLAHASSEE

Tallahassee Office: 117 South Gadsden Tallahassee, Florida 32301 (850) 222-2525 (850) 222-5606 Fax

October 14, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re: Docket Nos.: 020119-TP and 020578-TP

Dear Ms. Bayo:

On behalf of Florida Competitive Carriers Association, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

Florida Competitive Carriers Association, Inc.'s Motion for Extension of Time

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

JAM/mls Enclosure

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FPSC-BUREAU OF RECORDS

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman & Arnold, P.A.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expedited review and cancellation of BellSouth Telecommunications, Inc.'s Key Customer promotional tariffs and for investigation of BellSouth's promotional pricing and marketing practices, by Florida Digital Network, Inc.

Docket No.: 020119-TP

In Re: Petition for expedited review and cancellation Of BellSouth Telecommunications, Inc.'s Key Customer promotional tariffs by Florida Competitive Carriers Association.

Docket No.: 020578-TP

Filed: October 14, 2002

FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S MOTION FOR EXTENSION OF TIME

The Florida Competitive Carriers Association ("FCCA"), through its undersigned counsel, files this Motion for Extension of Time, and states:

- 1. As presently scheduled, prefiled direct testimony is due in the above dockets on October 18, 2002.
- 2. Due to case load considerations and other commitments, FCCA moves for an extension of the deadline for the filing of prefiled testimony until and including October 23, 2002, an extension of only five (5) days.
- 3. By this Motion, FCCA does not seek to alter any other procedural milestone. Dates for the filing of rebuttal testimony, prehearing statements, the prehearing conference, and the hearing date would be unaffected. FCCA notes that even with the change parties will have almost thirty days after receipt of direct testimony within which to prepare and file their rebuttal testimony.
- 4. FCCA has contacted counsel for Florida Digital Network (FDN), BellSouth Telecommunications, Inc., ITC Deltaom and XO Communication, Inc. FDN supports the motion. BellSouth, XO and ITC do not oppose the motion.

WHEREFORE, FCCA moves for an order extending the time for the filing of direct testimony in the above dockets to and including October 23, 2002.

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Vicki Gordon Kaufman
Timothy J. Perry
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Attorneys for the Florida Competitive Carriers Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Competitive Carriers Association's Request for Extension of Time was on this 14th day of October 2002, sent by (*) hand delivery, (**) e-mail or by U.S. Mail to the following:

(*)(**) Felicia Banks Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399 fbanks@psc.state.fl.us

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