January 16, 2001

Robert J. Casey
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Florida Public Service Commission
Division of Competitive Services
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Dear Mr. Casey:

I am writing in response to your letter dated December 11, 2000, wherein you advised SBC Telecom that it needed to file a written request for an extension of time in which to activate Central Office Code, NPA 954-nxx 317.

We are requesting an extension for Central Office Code 954-317 in the Pompano Beach, Florida area. There are a number of circumstances that have come together to make this request for an extension necessary. These circumstances are described in the paragraphs that follow. Although this letter attributes various aspects of the delay in activating the 954-317 Central Office Code to third parties, the construction of collocation facilities and the installation of all equipment necessary to conduct facilities-based telecommunications service is a complex endeavor, and it is rarely fair to attribute delay to one party only. Thus, it is our goal merely to summarize the actions that have resulted in the current delay.

Please note that we are invoking the confidentiality provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

Initially, there was delay in the construction of the collocation site.

These delays were compounded by a facilities issue.

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These issues have now been resolved, and we anticipate having a test line in the NPA/NXX turned up no later than Friday, January 19, 2001.

The steps we have taken in securing our NXX as we proceed with developing our network are reasonable steps for any new facilities-based CLEC, and our need for additional time to implement this NPA/NXX is not unreasonable. Further, we would point out that we have secured in Florida only the bare minimum number of NXXs to enable us to provide facilities based service to customers located in rate centers where SBC Telecom will have collocated facilities - one per rate center in which we have collocated facilities. It is in the public interest for SBC Telecom to retain the code and we respectfully request your consideration in granting an extension of thirty days from today in order for us to do so.

Please do not hesitate to contact me if you have any questions or need additional information. I look forward to your positive response.

Sincerely.

Christine Shoys

Area Manager- Code Administration

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