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RECORDS AND REPORTING



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, Florida 32399-1400
850-488-9330

March 20, 2001

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 991378-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Joint Motion for Continuance being filed on behalf of Office of Public Counsel and BellSouth Telecommunications, Inc.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck,
Deputy Public Counsel

APP _____
CAF _____ CJB:bsr
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SEC 1 _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

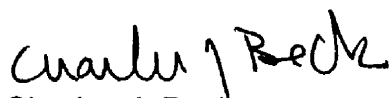
In re: Initiation of Show Cause) Docket no. 991378-TL
Proceedings against BellSouth)
Telecommunications, Inc.,) Filed March 20, 2001
for Violation of Service Standards)

JOINT MOTION FOR CONTINUANCE

The Citizens of Florida (Citizens), by and through Jack Shreve, Public Counsel, and BellSouth Telecommunications, Inc. (BellSouth) file this motion requesting a continuance of at least three months for all pending events in this proceeding.

Citizens and BellSouth have been negotiating a settlement of this case. While no agreement has been reached yet, both parties believe that it may be possible to reach an agreement with additional time. Citizens and BellSouth request this continuance for all pending procedural events, including the prehearing conference and the hearing, as well as the dates for filing surrebuttal testimony and prehearing statements.

Respectfully submitted on March 20, 2001.



Charles J. Beck
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

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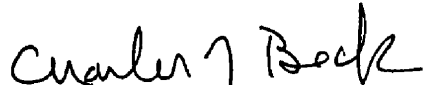
Nancy B. White
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, FL 32301

(305) 347-5558

DOCKET NO. 991378
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished
by U.S. Mail or hand-delivery to the following parties on March 20, 2001.



Charles J. Beck

Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe, Suite 400
Tallahassee, FL 32301

Beth Keating
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Florida Public Service Commission
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Rick Moses
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Florida Public Service Commission
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991378.request for continuance