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> > April 9, 2001

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Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re: Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of AT&T Communications of the Southern States, Inc., TCG South Florida, Global NAPS, Inc., MediaOne Florida Telecommunications, Inc., Time Warner Telecom of Florida, LP, Florida Cable Telecommunications Association, Inc., and the Florida Competitive Carriers Association, are the original and fifteen copies of a Joint Motion for Extension of Time to File Rebuttal Testimony.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman

KAH/rl Enclosures

APS

cc: All Parties of Record

RECEIVED & FILED

PPSG-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE.

04381 APR-95

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate	)	
methods to compensate carriers for	)	Docket No. 000075-TP
exchange of traffic subject to Section 251	)	
of the Telecommunications Act of 1996.	)	
	)	Filed: April 9, 2001

## JOINT MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

AT&T Communications of the Southern States, Inc., TCG of South Florida, Global NAPS, Inc., MediaOne Florida Telecommunications, Inc., Time Warner Telecom of Florida, LP, Florida Cable Telecommunications Association, Inc., and the Florida Competitive Carriers Association, as joint sponsors of the testimony of Lee Selwyn, by and through the undersigned counsel, respectfully move the Commission for a one week extension of time to file Dr. Selwyn's rebuttal testimony in Phase II of the instant docket. As grounds therefor, Joint Movants state:

- 1. Pursuant to Order No. PSC-01-0632-PCO-TP issued March 15, 2001, modifying Order No. PSC-00-2229-PCO-TP, the rebuttal testimony and exhibits of all witnesses in Phase II of this docket is due to be filed April 12, 2001.
- 2. That despite diligent effort, Dr. Selwyn will be unable to complete his rebuttal testimony by April 12, 2001 due to significant conflicts with other professional duties. Dr. Selwyn has a number of professional obligations which conflict with and impede his ability to complete rebuttal testimony by April 12, 2001. These obligations include:
- a) the preparation of testimony due to be filed before the Oregon Commission on Tuesday, April 10, 2001; and
- b) participation in reciprocal compensation hearings before the New Hampshire Commission on Wednesday and Thursday, April 11 and 12, 2001.

DOCUMENT NUMBER-DATE

3. The undersigned has contacted counsel for all parties and is authorized to represent that there is no objection to the granting of a one week extension to allow Dr. Selwyn to complete his rebuttal testimony so long as that extension is granted to all other witnesses and the extension would not result in any other delay in the docket.

WHEREFORE, the joint sponsors of the testimony of Dr. Lee L. Selwyn respectfully request that this Commission grant a one week extension for the filing of prefiled rebuttal testimony addressing the Phase II issues in this docket.

Respectfully submitted,

Kenneth A. Hoffman, Esq.

Martin P. McDonnell, Esq.

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 9<sup>th</sup> day of April, 2001:

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