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May 2, 2001

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RECORDS AND  
REPORTING

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

**Re: Docket No. 000121-TP (OSS)**

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth's Motion for Two Week Extension of Time to File Brief, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM 6 \_\_\_\_\_  
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OPC \_\_\_\_\_  
PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
SER \_\_\_\_\_  
OTH \_\_\_\_\_

Sincerely,

*J. Phillip Carver*  
J. Phillip Carver (KA)

Enclosures

cc: All parties of record  
Marshall M. Criser, III  
Nancy B. White  
R. Douglas Lackey

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**CERTIFICATE OF SERVICE  
Docket No. 000121-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
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**(+) Signed Protective  
Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the ) Docket No. 000121-TP  
Establishment of Operations Support )  
Systems Permanent Performance )  
Measures for Incumbent Local Exchange )  
Telecommunications Companies ) Filed: May 2, 2001  
\_\_\_\_\_ )

**BELLSOUTH'S MOTION FOR TWO WEEK  
EXTENSION OF TIME TO FILE BRIEF**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files, pursuant to Rule 28-106.204, Florida Rules of Administrative Procedure, its Motion for a Two Week Extension of the Time for filing the Briefs in this matter, and states the following:

1. Currently, the transcript is due to be issued in this proceeding on this date. Briefs by the parties are due two weeks later, i.e., on May 16, 2001. BellSouth hereby requests that the deadline for filing Briefs be extended by two weeks, until and including May 30, 2001, for all parties. BellSouth also contemplates that all other aspects of the case schedule, including the Staff Recommendation and the Order by the Commission shall be extended as necessary to accommodate the requested extension.

2. In support of its Motion, BellSouth offers the following: The two week period allotted in this proceeding for the filing of Briefs is a relatively short period, but one that would no doubt be adequate in a less complex case. In this proceeding, however, the issues are considerably more complex than in most cases. In consideration of this, the Pre-Hearing Order sets forth that the parties shall be allowed to file Briefs of 80 pages, rather than the 40 pages to which parties are typically limited. The same complexity that supported this change from the normal guidelines also supports a longer briefing period. Moreover, during the two week period

that has been allotted to prepare Briefs, each of the three counsel that appeared on behalf of BellSouth in this proceeding has at least one hearing in either this or another jurisdiction. Moreover, one of the three will be out of the country for a portion of the two week period. Given the above, two weeks is an inadequate time to allow BellSouth to prepare its Brief in this matter. The requested extension will not prejudice any party to this proceeding.

3. Pursuant to Rule 28-106.204, “when time allows, the other parties [to the proceeding] may, within seven days of service of a written Motion, file a response in opposition.” In this particular case, BellSouth does not believe that there is adequate time to allow seven days for responses to be filed. Specifically, since the Brief is currently due to be filed in two weeks, allowing time for service as well as the seven day response time, creates a situation in which, if this request were denied, the parties would have virtually no time remaining in the two week period to attempt to prepare Briefs. For this reason, BellSouth requests that the Commission rule upon this Motion without waiting seven days for responses from other parties.

4. BellSouth has endeavored to confer with counsel for each of the parties that actively participated in the hearing of this matter to determine whether there is any objection to this Motion. Counsel for BellSouth successfully contacted counsel for AT&T, MCI, Z-Tel, e.spire, M-Power, Covad, and the Florida Cable Telecommunications Association, and hereby represents that none of these parties have any objection to the requested extension of time.

WHEREFORE, BellSouth respectfully requests the entry of an Order extending the time for filing Briefs by the parties in this proceeding until, and including May 30, 2001.

Respectfully submitted this 2nd day of May, 2001.

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