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The Helein Law Group, P.C.

8180 Greensboro Drive Suite 700 McLean, VA 22102

Telecommunications

Corporate & Finance Trademarks

**Proprietary Rights** 

Complex Litigation

General Business Law

E Commerce

Technology

(703) 714-1300 (Telephone) (703) 714-1330 (Facsimile) mail@helein.com

Management Consulting Group Global Telecompetition Consultants, Inc. (GTC) (703) 714-1320 (Telephone)

Writer's Direct Dial Number

(703) 714-1305

August 3, 2001

pdean@helein.com

Writer's E-mail Address

# VIA OVERNIGHT DELIVERY

Florida Public Service Commission 2540 Shumard Oak Boulevard Gerald Gunter Building Tallahassee, Florida 32399-0850

#### Re: Request for Deferment of the Show Cause Scheduling of Direct Testimony and Exhibits for WebNet Communications, Inc., Docket No. 001109-T1 to Allow the Continuation of Settlement Negotiations with the Commission

Ladies and Gentlemen:

On behalf of WebNet Communications, Inc. we hereby transmit an original and seven (7) copies of its Request for Deferment of the Show Cause Scheduling of Direct Testimony and Exhibits to allow the continuation of settlement negotiations with the Commission.

WebNet's attorneys also note that they have yet to receive a Commission copy of the Order Establishing Procedure in this Matter and respectfully request that the undersigned receive such copies or notifications as may be appropriate in future filings of this proceeding. Thank you for your time and assistance in consideration of these requests.

An extra copy of this letter and filing is enclosed to be date-stamped and returned to the undersigned in the pre-addressed, postage-paid envelope provided. Should any questions arise, kindly contact the undersigned.

Respectfully submitted,

Paul A. Dean Regulatory Counsel

Enclosures

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### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Initiation of show cause Proceedings against WebNet Communications, Inc. for Apparent violation of Rule 25-4.118, F.A.C., Local, Local Toll, and Toll Provider Selection. DOCKET NO. 001109-T1 Filed Date: August 6, 2001

## **Motion for Extension of Time**

On behalf of WebNet Communications, Inc. ("WebNet" or "Company") we hereby respectfully request a Deferment of the Show Cause Scheduling of Direct Testimony and Exhibits for Docket no. 001109-TI for apparent violation of Rule 25-4.118 F.A.C.. Direct Testimony and Exhibits for this Docket are presently due on August 6. Attorneys for WebNet have been in good faith and diligent contact with Staff Counsel, Wayne Knight, throughout the months of June and July attempting to schedule a date for the previously granted settlement conference. Mr. Knight is currently on vacation through the 6<sup>th</sup> of August. Thus, it is presently impossible for WebNet to settle this matter without undertaking the unnecessary and burdensome expense of filing Direct Testimony and Exhibits.

WebNet's attorneys therefore respectfully request an opportunity to hold, or at least schedule, the settlement conference with Mr. Knight before proceeding to file Direct Testimony in this matter. Webnet affirms its belief that it is in the best interests of the Commission, itself, and the public to settle this matter with a minimal expenditure of the Commission's resources. In this spirit, WebNet's attorneys respectfully proffer two solutions to the Commission. The Company's attorneys request a two-week continuance to allow the Company to have the approved settlement conference with staff before proceeding with this Show Cause. Alternatively, WebNet requests a stay in this proceeding until such time as the parties have met for the planned settlement conference.

WebNet's attorneys also note that they have conferred with the other party of record in this matter, the Public Service Commission. Since Mr. Knight was unavailable and we were unable to reach the staff person assigned, Melinda Watts, the attorneys spoke with another staff attorney on this matter and that attorney voiced no objection to this Motion. Motion for Extension of Time Docket No. 001109-T1 Page 2

If the Commission does not see fit to grant either of the Company's requests, WebNet's attorneys hereby petition the Commission for a three day extension from such denial in which the Company may file the required Direct Testimony.

Respectfully submitted,

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Paul A. Dean Regulatory Counsel

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### **CERTIFICATE OF SERVICE**

This is to cerify that I have on this day served upon those persons listed below a true and correct copy of the foregoing, Request for Deferment of the Show Cause Scheduling of Direct Testimony and Exhibits for WebNet Communications, Inc., Docket No. 001109-T1 to Allow the Continuation of Settlement Negotiations with the Commission by depositing a copy of same in the Federal Express Delivery Mail in a properly addressed envelope with sufficient postage thereon to insure delivery to:

> Florida Public Service Commission 2540 Shumard Oak Boulevard Gerald Gunter Building Tallahassee, Florida 32399-0850

This <u>3.</u> day of August 2001.

The Helein Law Group, P.C.

Paul A. Dean, Esq. 8180 Greensboro Drive, Suite 700 McLean, Virginia 22102 (703) 714-1305