

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the)
Establishment of Operations Support)
Systems Permanent Performance) Docket No. 000121-TP
Measures for Incumbent Local Exchange)
Telecommunications Companies) Filed: October 9, 2001
_____)

**MOTION FOR EXTENSION OF TIME
TO FILE COMMENTS AND TO POSTPONE WORKSHOP**

AT&T Communications of the Southern States, Inc. ("AT&T"), DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), and WorldCom, Inc. ("WorldCom") (collectively, "Joint ALECs") hereby file a Motion for Extension of Time to File Comments and to Postpone Workshop.¹ In support thereof, Joint ALECs state the following:

1. The Commission issued its Order No. PSC-01-1819-FOF-TP ("Order") in this proceeding on September 10, 2001.
2. At paragraph 141 of the Order, the Commission required the Staff to conduct "a status conference 30 days after the Final Order in this docket to discuss BellSouth's proposed performance assessment. Furthermore, our staff is directed to work with BellSouth regarding an appropriate date prior to the status conference by which a draft can be provided. BellSouth shall file a revised performance assessment plan consistent with this Order, within 45 days of the Final Order in this docket[.]"
3. To the best of their knowledge, Joint ALECs have not been served by BellSouth with a copy of BellSouth's draft SQM. Instead, on October 4, 2001, Staff

¹ Covad and WorldCom have given their permission for AT&T to sign and file this Motion on their behalves.

issued an Email to various parties informing them that an informal conference would be held to discuss a draft of an SQM submitted by BellSouth, apparently, to Staff. This was the first time Joint ALECs received a copy of BellSouth's draft SQM. The October 4, 2001, Email was sent to the parties only eleven days prior to date set forth by the Staff for the informal conference.

4. In the October 4, 2001, Email, Staff directed parties to file any written comments on BellSouth's draft SQM by October 11, 2001. The draft SQM submitted by BellSouth is 184 pages long, single space.

5. BellSouth still has not submitted a copy of its Performance Assurance Plan.

6. Seven days is insufficient time for Joint ALECs to review the draft SQM in detail, compare it to all of the requirements set forth in the Order (which is over 200 pages long) and provide comments on any deficiencies in the draft SQM. The documents are very detailed, and require a page-by-page, and even a line-by-line review, which is a very tedious and time consuming process. Even a cursory review by Joint ALECs has revealed that BellSouth's draft SQM does not comply with the Commission's Order. A comprehensive review will be required to determine each and every instance in which BellSouth's draft SQM does not comply with the Commission's Order. Obviously, it will be even more difficult for Joint ALECs to review and comment on BellSouth's Performance Assurance Plan, which BellSouth has not yet submitted.

7. Moreover, eleven days is insufficient time for Joint ALECs to be prepared to discuss at an informal conference any deficiencies in the draft SQM, not to mention the not-yet-submitted Performance Assurance Plan.

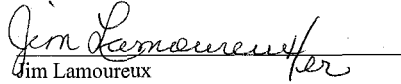
8. Joint ALECs believe it was the intent of the Commission to allow parties to review any SQM and Performance Assurance Plan submitted by BellSouth to assure that such submissions comply with the Commission's Order. Certainly, the Commission did not intend to simply approve any submissions made by BellSouth and asserted by BellSouth as compliant with the Commission's Order. If not permitted sufficient time to comment on BellSouth's submissions, Joint ALECs' only other alternative will be to incorporate their comments into a Motion for Reconsideration of the Commission's adoption of BellSouth's submissions, which will only further delay the final adoption of permanent performance measures in Florida. Joint ALECs believe the Commission intended to provide for a review and comment period precisely to avoid such delay.

CONCLUSION

For the reasons set forth above, Joint ALECs respectfully request an extension of time to file comments on BellSouth's draft SQM (as well as its Performance Assurance Plan, once it is submitted) and to postpone the informal conference scheduled by the Staff for October 15, 2001. Joint ALECs request that the informal conference be postponed until November 5, 2001, and that they be permitted until October 29, 2001, to submit comments on BellSouth's submissions. Further, because of the limited time remaining until the time set forth by Staff for comments and the informal conference, Joint ALECs

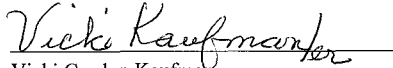
request that the Hearing Officer rule on this Motion so as to allow for a possible decision before the scheduled date of comments and the informal conference.

Respectfully submitted,



Jim Lamoureux
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309
(404) 810-4196

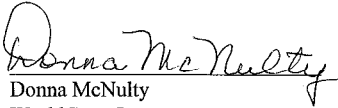
**Attorney for AT&T Communications of
the South Central States, Inc.**



Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Catherine F. Boone
Regional Counsel
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, Georgia 30328-3495
(678) 222-3466 Telephone
(678) 320-0004 Telefax

**Attorneys for DIECA Communications,
Inc., d/b/a Covad Communications
Company**



Donna McNulty
WorldCom, Inc.

325 John Knox Road, Ste. 105
Tallahassee, FL 32303-4131
850-422-1254

Attorney for WorldCom, Inc.

October 9, 2001

***** END OF FILING *****