Legal Department

James Meza III Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

July 17, 2002

ORIGINAL 17 PM 4:

Mrs. Blanca S. Bayó Director, Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 020129-TP: Joint Petition of US LEC of Florida, Inc., Time Warner Telecom of Florida, LP and ITC^DeltaCom, Communications objecting to and requesting suspension of proposed CCS7 Access <u>Arrangement Tariff filed by BellSouth Telecommunications, Inc.</u>

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time, which we ask that you file in the captioned docket.

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

Sincerely,

James Meza III

Enclosures AUS CAF CMP cc: All Parties of Record COM Marshall M. Criser III CTR R. Douglas Lackey ECR Nancy B. White OPC MMS SEC \_ RECEIVED & FILED OTH FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE 07458 JUL 178 FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE DOCKET NO. 020129-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 17th day of July 2002 to the following:

Jason Fudge Adam Teitzman Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 jfudge@psc.state.fl.us Ateitzma@psc.state.fl.us

Kenneth A. Hoffman, Esq. Marsha Rule, Esq. (+) Martin P. McDonnell, Esq. (+) Rutledge, Ecenia, Purnell, Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302-0551 Tel. No. (850) 681-6788 Fax. No. (850) 681-6515 Attys. for US LEC Ken@Reuphlaw.com

Karen Camechis, Esq. Pennington Law Firm P.O. Box 10095 Tallahassee, FL 32302-2095 Tel. No. (850) 222-3533 Fax. No. (850) 222-2126 Atty. for Time Warner karen@penningtonlawfirm.com Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802 Tel. No. (256) 382-3856 Fax. No. (256) 382-3936 Atty. for ITC^DeltaCom nedwards@itcdeltacom.com Ē

Richard D. Melson Gary V. Perko Hopping Green & Sams, P.A. P.O. Box 6526 Tallahassee, FL 32314 Tel. No. (850) 425-2313 Represents MCI rmelson@hgss.com

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Una III

James Meza III

(+) Signed Protective Agreement

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of US LEC of Florida, Inc., ) Time Warner Telecom of Florida, LP and ) ITC^DeltaCom Communications Objecting to ) And Requesting Suspension of Proposed ) CCS7 Access Arrangement Tariff filed by ) BellSouth Telecommunications, Inc. )

Docket No.: 020129-TP

Filed: July 17, 2002

## BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204(5), Florida Administrative Code, requests that the Florida Public Service Commission ("Commission") grant it a seven (7) day extension of time or until July 29, 2002, in which to file Rebuttal Testimony. In support of this motion, BellSouth states the following:

1. Pursuant to the Order Establishing Procedure, issued on June 21,

2002, Order No. PSC-02-0853-PCO-TP, Rebuttal Testimony is due on July 22, 2002.

2. Because of previous work commitments, including filings and hearings in other states, BellSouth needs additional time to file Rebuttal Testimony in the captioned docket.

3. The Parties would not be prejudiced by a seven (7) day extension of time. Further, BellSouth would not object to all parties receiving a similar extension.

4. BellSouth has contacted all parties to the proceeding to ascertain their position as to BellSouth's request. To date, ITC^DeltaCom

Communications ("ITC^DeltaCom") and MCI WorldCom, Inc.'s ("MCI") counsel have responded, and they indicated that ITC^DeltaCom and MCI do not object to BellSouth's request, as long as the extension applies to all parties. As stated above, BellSouth does not object to this request.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it, and all other parties, a seven (7) day extension of time or until July 29, 2002, in which to file Rebuttal Testimony.

Respectfully submitted this 17th day of July, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

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