ORIGINAL

J. Phillip Carver Senior Regulatory Counsel

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March 11, 2003

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

RE: Docket No. 020738-TP (AT&T Switched Access Contract Tariff)

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of the Joint Motion of BellSouth and AT&T For Continuance, 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,

J. Phillip Carver

Enclosures

AUS

CAF

cc: Michael Barrett Marshall M. Criser III R. Douglas Lackey Nancy B. White

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE DOCKET NO. 020738-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 11th day of March, 2003 to the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Amended Petition of AT&T)	
Communications of the Southern States,)	Docket No. 020738-TP
LLC for Suspension and Cancellation of)	
General Intrastate Access Tariff Filed by)	Filed: March 11, 2003
BellSouth Telecommunications, Inc.)	

JOINT MOTION OF BELLSOUTH AND AT&T FOR CONTINUANCE

BellSouth Telecommunications, Inc. ("BellSouth") and AT&T Communications of the Southern States ("AT&T") hereby jointly file this Motion For Continuance in the above-styled matter, and state the following:

- 1. This matter is currently set to be heard beginning May 12, 2003, and Direct Testimony is due to be filed shortly (i.e., by March 17, 2003). At the same time, the parties are currently engaged in settlement negotiations, which they anticipate will result in the amicable resolution of all matters at issue in this proceeding. These negotiations, however, are ongoing and will require additional time before they conclude.
- 2. In light of the above, the parties hereby request that the Commission continue all scheduled events in this matter for a period of not less than 60 days. Specifically, the parties request that the Commission reschedule the hearing to commence on the first available date on or after, July 11, 2003. The parties also request that the Commission continue all other due dates in this proceeding, for a period of no less than 60 days. Although the parties understand that a new case schedule will depend, in part, on the available hearing dates, they request that the following dates be set no sooner than as set forth below:

Filing of Direct Testimony – May 16, 2003

DOCUMENT NUMBER-DATE

02420 MAR 118

Filing of Rebuttal Testimony – June 9, 2003 Filing of Prehearing Statements – June 9, 2003 Prehearing Conference – June 22, 2003

3. The parties also mutually agree that no discovery will be propounded by either party for a period of 60 days, commencing with the date upon which this motion is filed. With the filing of this Motion, AT&T hereby withdraws its First Set of Interrogatories and Request for Production, which was propounded upon BellSouth on February 24, 2003. AT&T reserves the right to propound this or other discovery on BellSouth at the conclusion of the 60 day period referred to above.

WHEREFORE, for the reasons set forth above, BellSouth and AT&T jointly request that the Commission continue the hearing and all other scheduled due dates in this proceeding for a period of not less than 60 days.

Respectfully submitted this 11th day of March, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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