

ORIGINAL

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April 14, 2003

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

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time to Answer Interrogatories, 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 the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver
J. Phillip Carver (KA)

AUS _____
CAF _____
CMP _____
COM 5 _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC 1 _____
OTH _____

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (#), First Class U.S. Mail, and Electronic Mail this 14th day of April, 2003 to the following:

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J. Phillip Carver (JPC)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive)	
Carriers for Commission Action)	Docket No. 981834-TP
To Support Local Competition)	
In BellSouth's Service Territory)	
In re: Petition of ACI Corp. d/b/a)	
Accelerated Connections, Inc. for)	Docket No. 990321-TP
Generic Investigation into Terms and)	
Conditions of Physical Collocation)	
_____)	Filed: April 14, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR EXTENSION OF TIME TO ANSWER INTERROGATORIES**

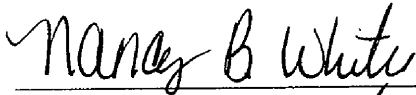
BellSouth Telecommunications, Inc. ("BellSouth"), hereby files its Motion for Extension of Time to Answer Interrogatories and states the following:

On March 25, 2003 the Staff of the Florida Public Service commission propounded upon BellSouth its Fifth Request for Production of Documents and its Fourth Set of Interrogatories. This discovery includes 47 Interrogatories and 32 Production Requests. Moreover, under the expedited discovery schedule set forth in the procedural order in this docket, BellSouth has only 20 days to respond to this discovery, rather than the 30 days it would typically have pursuant to the Florida Codes of Civil Procedure. Given the volume of this discovery, and the shortened time frame, BellSouth has been unable to complete its answers to the interrogatories during this time frame. Accordingly, BellSouth requests that the time for responding to the interrogatories be extended by four days, until Friday, April 18, 2003.

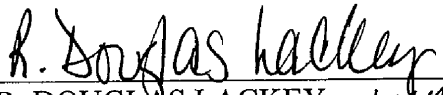
BellSouth has attempted to contact Staff regarding the requested extension, but was unable to reach a staff member. BellSouth did leave two voice messages to inform staff of its intention to request the extension. This requested extension will not prejudice any party to this proceeding.

WHEREFORE, BellSouth respectfully requests the entry of an order extending the time to respond to the interrogatories described above by a period of four days, making the responses due on or before April 18, 2003.

Respectfully submitted this 14th day of April, 2003.



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