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Enclosure

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Sincerely,

SUSS Moth

Susan S. Masterton

and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and 15 copies of Sprint-Florida,

Motion for Extension of Time.

Docket No. 030457 Joint Motion for Extension of Time.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter

Incorporated ("Sprint") and NewSouth Communications Corp. ("NewSouth") Joint

Copies are being served on the parties in this docket via electronic and US mail.

Susan S. Masterton Attorney

Law/External Affairs Post Office Box 2214 1313 Blair Stone Road Tallahassee, FL 32316-2214 Mailstop FLTLHO0107 Voice 850 599 1560 Fax 850 878 0777 susan.masterton@mail.sprint.com





Re:

September 16, 2003

Ms. Blanca S. Bayó, Director Division of the Commission Clerk

2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Florida Public Service Commission

& Administrative Services

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

Enforcement of interconnection agreement ) Between NewSouth Communications Corp. ) and Sprint-Florida, Inc. ) Docket No. 030457-TP Filed: September 16, 2003

## JOINT MOTION FOR EXTENSION OF TIME

Sprint-Florida, Incorporated ("Sprint") and NewSouth Communications Corp.

("NewSouth") move this Commission for an extension of time to file direct testimony. In support thereof, Sprint and NewSouth state as follows:

- Direct testimony in this docket is scheduled to be filed on September 17, 2003.
- On August 28, 2003 the parties engaged in mediation in the presence of a Commission mediator and reached a conceptual settlement of the issues disputed in this docket.
- 3. The parties are currently in the process of finalizing a formal settlement agreement embodying the settlement reached at the mediation.
- 4. The parties anticipate that the agreement will be executed and the obligations required of each party under the agreement will be completed in the near future, at which time NewSouth will dismiss its complaint that is the subject of this docket.
- 5. Pending final resolution of the settlement agreement, the parties are requesting that the Commission extend the time for filing of direct testimony until October 15, 2003. By that date the execution of the settlement agreement and fulfillment of its terms should be completed and the complaint withdrawn. If

for any unforeseen reason that has not occurred the parties can proceed with the case at that time.<sup>1</sup>

WHEREFORE, in light of the above, Sprint and NewSouth respectfully request that the Commission grant this joint request for an extension of the time to file direct testimony in this docket until October 15, 2003.

RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of September 2003.

Show S. hotel

Susan S. Masterton P.O. Box 2214 Tallahassee, FL 32316-2214 850-599-1560 850-878-0777 (fax)

ATTORNEY FOR SPRINT

Jon C. Moyle, Jr. Moyle, Flanigan, Katz, Raymond & Sheehan The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 (850) 681-3828 (phone) (850) 681-8788 (fax) jmoylejr.@moylelaw.com

ATTORNEY FOR NEWSOUTH

<sup>&</sup>lt;sup>1</sup> If for any reason settlement of the dispute is not concluded and the case proceeds, the rebuttal testimony date would also need to be revised consistent with the revised direct testimony date. Sprint and NewSouth would suggest a new date of November 5, 2003, which would not interfere unduly with preparation for the hearing scheduled for December 8, 2003.

## CERTIFICATE OF SERVICE DOCKET NO. 030457

I HEREBY CERTIFY that a true and correct copy of the foregoing was served both Electronic Mail and U.S. Mail this 16<sup>th</sup> day of September, 2003 to the following:

Mintz Law Firm Michael H. Pryor/Angela F. Collins 701 Pennsylvania Ave., NW Ste. 900 Washington, DC 20004-2608

Moyle Law Firm (Tall) Jon Moyle, Jr. The Perkins House 118 N. Gadsden St. Tallahassee, FL 32301

NewSouth Communications Corp. Keiki Hendrix/Jake Jennings Two North Main Center Greenville, SC 29601-2719

Public Service Commission Felicia Banks, Esq. 2540 Shumard Oak Blvd. Tallahassee, FL 32399

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Susan S. Masterton