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**Richard A. Chapkis** Vice President & General Counsel, Southeast Region Legal Department FLTC0007 201 North Franklin Street (33602) Post Office Box 110 Tampa, Florida 33601-0110

Phone 813 483-1256 Fax 813 273-9825 richard.chapkis @verizon.com

September 18, 2003

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

Re: Docket No. 981834-TP

> Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP

Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of Verizon Florida Inc.'s Motion For Extension of Time for filing in the above matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

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OTH

Laphis /BE Richard A. Chapkis COM 5

RAC:tas Enclosures

BUREAU OF RECORDS



Verizon Communications 106 East College Avenue, Suite 810 Tallahassee, FL 32301

Phone 850.222.6300 Fax 850.222.2912

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Motion For Extension of Time in Docket Nos. 981834-TP and 990321-TP were sent via electronic mail and U.S. mail on September 18, 2003 to the parties on the attached list.

Lichard Chaphie / BE Richard Chapkies

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

In re: Petition of Competitive Carriers for Commission action to support local Competition in BellSouth Telecommunications Inc.'s service territory

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation. Docket No. 981834-TP Filed: September 18, 2003

Docket No. 990321-TP

## VERIZON FLORIDA INC.'S MOTION FOR EXTENSION OF TIME

Pursuant to Commission Rule 28-106.204, Florida Administrative Code, Verizon Florida Inc. ("Verizon") respectfully requests a three-day extension of time to file its Surrebuttal Testimony, currently due September 23, 2003. Verizon will email its testimony to the parties on September 25, 2003, with hard copies filed with the Commission the next day. Verizon's request would apply to all parties.

Good cause exists for granting Verizon's request. Verizon's counsel, and a couple of collocation subject matter experts, are located in the Washington, DC area, which is currently under a hurricane advisory. States of emergency have been declared in Washington, DC and the surrounding area, and the federal and state governments, Verizon counsel's office and the public transportation systems are all closed. Most of these closures are expected through Friday night. In addition, severe power outages are expected throughout the Washington, DC area - and power may take several days

to restore. Given these circumstances, it would be very difficult for Verizon to finalize its testimony in time to make a federal express deadline on Monday, September 22.

Sprint, AT&T, FDN, Staff and Covad have stated that they have no objection to Verizon's request, provided that the extension applies to all parties. Verizon has been unable to reach BellSouth.

Respectfully submitted on September 18, 2003.

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By:

ohis/BF Richard Chapkis

Verizon Florida Inc. Post Office Box 110, FLTC0007 Tampa, Florida 33601 Telephone: 813-483-1256

Catherine Ronis Daniel McCuaig Jonathan Frankel Wilmer Cutler & Pickering 2445 M Street N.W. Washington, DC 20037-1420 Telephone: 202-663-6000

Attorneys for Verizon Florida Inc.

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Virginia C. Tate/Lisa A. Riley AT&T 1200 Peachtree Street N.E. Suite 8066 Atlanta, GA 30309-3523

Catherine Ronis Daniel McCuaig Jonathan Frankel Wilmer Cutler & Pickering 2445 M Street N.W. Washington, DC 20037-1420

Kenneth Hoffman Rutledge Law Firm 215 S. Monroe St., Suite 420 Tallahassee, FL 32302

Terry Monroe/Genevieve Morelli CompTel 1900 M Street N.W. Suite 800 Washington, DC 20036

David Tobin Fla. Public Telecomm. Assn. c/o Tobin & Reyes 7251 W. Palmetto Park Road #205 Boca Raton, FL 33433-3487

Mark E. Buechele Supra Telecommunications 2620 SW 27<sup>th</sup> Avenue Miami, FL 33133 Nancy Sims BellSouth Telecomm. Inc. 150 S. Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Blue Star Communications Inc. c/o Robert Waldschmidt Howell & Fisher Court Square Building 300 James Robertson Parkway Nashville, TN 37201-1107

Anu Seam U.S. Department of Justice Telecom Task Force Antitrust Division 1401 H Street N.W., Suite 8000 Washington, DC 20530

Andrew Isar Telecomm. Resellers Assn. c/o Miller Isar, Inc. 7901 Skansie Ave., Suite 240 Gig Harbor, WA 98335

Michael A. Gross Florida Cable Telecomm. Assn. 246 E. 6<sup>th</sup> Avenue, Suite 100 Tallahassee, FL 32303

John D. McLaughlin, Jr. KMC Telecom Inc. 1755 North Brown Road Lawrenceville, GA 30043-8119

Laura L. Gallagher MediaOne Florida Tele. 101 E. College Avenue Suite 302 Tallahassee, FL 32301 Rodney L. Joyce Shook Hardy & Bacon LLP 600 14<sup>th</sup> St NW, Suite 800 Washington, DC 20005-2004

Floyd R. Self Messer Law Firm P. O. Box 1876 Tallahassee, FL 32302

S. Masterton/C. Rehwinkel Sprint-Florida Incorporated 1313 Blairstone Road MC FLTLHO0107 Tallahassee, FL 32301

William H. Weber Covad Communications Co. 1230 Peachtree Street N.E. 19<sup>th</sup> Floor Atlanta, GA 30309-3574

Vicki Kaufman/Joe McGlothlin McWhirter Law Firm 117 S. Gadsden Street Tallahassee, FL 32301

Deborah Eversole General Counsel Kentucky Public Service Comm. P. O. Box 615 Frankfort, KY 40602

Don Sussman Network Access Solutions Corp Three Dulles Tech Center 13650 Dulles Technology Drive Herndon, VA 20171-4602 Brent McMahan Network Telephone Corporation 815 South Palafox Street Pensacola, FL 32501 Matthew Feil Florida Digital Network Inc. 390 N. Orange Avenue Suite 2000 Orlando, FL 32801 Tracy Hatch AT&T 101 N. Monroe, Suite 700 Tallahassee, FL 32301