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October 16, 2003

**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 030137-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are an original and fifteen copies of ITC^DeltaCom Communications, Inc.'s Motion to Increase the Number of Pages Allowed in the Parties' Post-Hearing Brief in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

  
Floyd R. Self

FRS/amb  
Enclosures

cc: Nanette Edwards, Esq.  
Parties of Record

DOCUMENT NUMBER-2411

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FPSC-COMMISSION CLEAR

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for arbitration of unresolved issues in negotiation of interconnection agreement with BellSouth Telecommunications, Inc. by ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom.

Docket No. 030137-TP  
Dated: October 16, 2003

**ITC^DELTA COM COMMUNICATIONS, INC.'S  
MOTION TO INCREASE THE NUMBER OF PAGES  
ALLOWED IN THE PARTIES' POST-HEARING BRIEFS**

ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom (hereinafter "DeltaCom"), pursuant to Rule 28-106.204, Fla. Admin. Code, hereby moves the Florida Public Service Commission (hereinafter "Commission") for an Order allowing the parties to this proceeding to file post-hearing briefs of 60 pages in length, thus exceeding the 40 page limit established in Section IV of the Commission's August 27, 2003 Prehearing Order, No. PSC-03-0971-TP, and as grounds therefore states:

1. This proceeding has proven to be complex, with a large number of issues remaining for the Commission's consideration and decision. As of today's date, the following 22 issues remain unsettled - 2, 8a, 9, 11a, 21, 25, 26, 36, 37, 44, 46, 47, 56, 57, 58, 59, 60, 62, 63, 64, 66, 67.

2. DeltaCom expects that just the recitation of the statement of issues and positions for each of those issues will consume a minimum of 8 pages of its post-hearing brief, leaving little space for providing proposed findings of fact and conclusions of law, and briefing the issues. This proceeding is of such considerable significance to both DeltaCom and BellSouth that the ability to adequately present a full analysis to the Commission should not be restricted due to the volume of issues remaining for consideration.

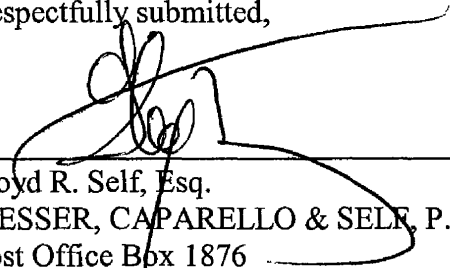
3. DeltaCom believes that a post-hearing brief of 60 pages in length would provide both DeltaCom and BellSouth with sufficient space to present proposed findings of fact and conclusions of law, the statement of issues and positions, and the brief as required by Section IV, Post-Hearing Procedures of Prehearing Order, No. PSC-03-0971-TP. DeltaCom does not believe that an expansion of the page limit to 60 pages would unduly burden the Commission or its staff given the number of issues that remain for the Commission's consideration and decision.

4. Counsel for DeltaCom has discussed this motion with counsel for BellSouth, and is authorized to represent that BellSouth agrees with the substance of this motion, so long as the page extension applies with equal force to the BellSouth post-hearing brief. Such an equal application was DeltaCom's intent, and DeltaCom requests that any such page limit extension authorized by the Commission apply to all parties to this proceeding.

WHEREFORE, ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom respectfully requests that the Commission enter an Order amending Section IV of the Commission's August 27, 2003 Prehearing Order, No. PSC-03-0971-TP and allowing for the submission of post-hearing briefs of 60 pages in length.

Dated this 16<sup>st</sup> day of October, 2003.

Respectfully submitted,



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Attorneys for ITC^DeltaCom Communications, Inc.  
d/b/a ITC^DeltaCom

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following parties by Hand Delivery (\*), and/or U. S. Mail this 16<sup>th</sup> day of October, 2003.

Patricia Christensen, Esq.\*  
General Counsel's Office, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
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Nancy B. White, Esq.\*  
c/o Ms. Nancy H. Sims  
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Floyd R. Self