ANDREW D. SHORE Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0765

October 17, 2003

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

> Re: <u>Docket No.: 020919-TP</u> Complaint of AT&T Communications of the Southern States, LLC, Teleport Communications Group, Inc., and TCG South Florida for Enforcement of Interconnection Agreements with BellSouth Telecommunications, Inc.

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Extension of Time to Respond to AT&T's Motion for Reconsideration of Order No. PSC-03-1082-FOF-TP, 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,

Andrew D. Shore (CC

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

DOCUMENT NUMBER-DATE

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

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In Re:	)	Docket No. 020919-TP
AT&T Communications of the Southern	)	
States, LLC, Teleport Telecommunications	)	
Group, Inc., and	)	
TCG South Florida for Enforcement of	)	
Interconnection Agreements with	)	-
BellSouth Telecommunications, Inc.	)	Filed: October 17, 2003

## BELLSOUTH'S REQUEST FOR EXTENSION OF TIME TO RESPOND TO AT&T'S MOTION FOR RECONSIDERATION OF ORDER NO. PSC-03-1082-FOF-TP

BellSouth Telecommunications, Inc. ("BellSouth"), by and through undersigned counsel, respectfully moves the Commission for an extension of time to file its Response to AT&T's Motion for Reconsideration of Order No. PSC-03-1082-FOF-TP. AT&T consents to the extension requested herein. In support of its Motion, BellSouth shows the Commission that:

1. The Staff filed its Recommendation in this case on September 4, 2003.

2. At its Agenda Conference on September 16, 2003, the Commissioners assigned to this case voted to adopt the Staff Recommendation.

3. The Commission issued its Order adopting Staff Recommendation on September 30, 2003.

4. Pursuant to Florida Administrative Code, BellSouth has only seven (7) calendar days to file its response to AT&T's motion for reconsideration.

5. BellSouth's counsel has travel and other conflicts over the next several days and needs additional time to prepare BellSouth's response to AT&T's motion.

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6. BellSouth's counsel has contacted counsel for AT&T and AT&T's counsel stated that AT&T agrees to the extension of time requested in this motion.

WHEREFORE, BellSouth requests that the Commission grant BellSouth an extension of time, until November 7, 2003, to file it's response to the Motion for Reconsideration.

Respectfully submitted, this 17th day of October 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE CB

JAMES MEZA III c/o Nancy H. Sims 150 South Monroe Street Suite 400 Tallahassee, FL 32301 (305) 347-5558

(mehren D. Shore

ANDREW D. SHORE Suite 4300, BellSouth Center 675 West Peachtree Street, N.E. Atlanta, GA 30375 (404) 335-0765

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## CERTIFICATE OF SERVICE **DOCKET NO. 020919-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 17th day of October, 2003 to the following:

Patricia Christensen Staff Counsel Florida Public Service Commission **Division of Legal Services** 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 pchriste@psc.state.fl.us

3

Loretta A. Cecil, Esq. (+) Womble Carlyle Sandridge & Rice PLLC 1201 West Peachtree Street Suite 3500 Atlanta, GA 30309 Tel. No. (404) 888-7437 Fax. No. (404) 870-4826 Icecil@wcsr.com **Represents AT&T** 

Virginia Tate, Esq. **AT&T** Communications 1200 Peachtree Street, N.E. Suite 8100 Atlanta, GA 30309 Tel. No. (404) 810-4196 Fax No. (404) 877-7648 vctate@att.com

Andrew D. Shore

(+) Signed Protective Agreement