Nancy B. White General Counsel - Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

October 20., 2003

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DE

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

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time, which we ask that you file in the captioned dockets.

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,

Nancy B. White

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

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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

First Class U.S. Mail and Electronic Mail this 20th day of October, 2003 to the following:

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Rancy B. White (cn)

(+) Signed Protective Agreement

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Carriers for Commission Action To Support Local Competition In BellSouth's Service Territory	)	Docket No. 981834-TP
In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and -	) ) )	Docket No. 990321-TP
Conditions of Physical Collocation	)	Filed: October 20, 2003

## BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204(5), Florida Administrative Code, requests that the Florida Public Service Commission ("Commission") grant it a six (6) day extension of time or until October 23, 2003, in which to file its Response to Covad Communications Company's ("Covad") Motion to Compel BellSouth to Respond to its Second Set of Discovery ("Motion"). In support of this motion, BellSouth states the following:

- 1. Covad served BellSouth with its Motion on October 10, 2003 by Hand Delivery and U.S. Mail, however BellSouth did not receive Covad's Motion until October 15, 2003 by U.S. Mail. Our response to this motion was due to be filed on October 17, 2003. Pursuant to the Order Establishing Procedure, issued on November 4, 2002, Order No. PSC-02-1513-PCO-TP, there is no extra time for mailing.
- BellSouth needs additional time to file its response to Covad's
   Motion.

- 3. The Parties would not be prejudiced by a six (6) day extension of time.
- 4. BellSouth has contacted counsel for Covad and they have consented to an extension of time to October 23, 2003 to respond to their Motion.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it, a six (6) day extension of time or until October 23, 2003, in which to file its response to Covad's Motion.

Respectfully submitted this 20th day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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