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MCWHIRTER REEVES

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TALLAHASSEE

TAILAHASSEE OFFICE: 117 SOUTH GADSDEN TAILAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5006 FAX

November 7, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re:

Docket No.: 020960-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

◆ DIECA Communications, Inc. d/b/a Covad Communications Company's Motion for Extension of Teim to File Interconnection Agreement.

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,

Vicki Gordon Kaufman

VGK/bae

Enclosures

AUS Enclosed CAF CMP COM 3 CTR ECR GCL OPC MMS SEC OTH

DOCUMENT NUMBER-DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of open issues resulting from interconnection negotiations with Verizon Florida, Inc. by DIECA Communications, Inc. d/b/a Covad Communications Company.

Docket No.: 020960-TP Filed: November 7, 2003

DIECA Communications, Inc. d/b/a Covad Communications Company's Motion for Extension of Time to File Interconnection Agreement

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to rule 28-106.204, Florida Administrative Code, file this Motion for Extension of Time to File Interconnection Agreement. As grounds therefore, Covad states:

- 1. On October 13, 2003, the Commission entered its Order No. PSC-03-1139-FOF-TP in the above docket and directed the parties to file an Interconnection Agreement within 30 days of the Order, making the final Interconnection Agreement due on November 12, 2003.
- 2. Covad requests an extension of time to file the final Agreement for two reasons. First, the parties have worked diligently to comply with the deadline established in the Commission's Order, the parties have not yet reached agreement on language implementing all of the determinations in that Order and do not anticipate being able to do so by November 12, 2003. The additional time requested would permit the parties to finish drafting and finalize such language.
- 3. Second, on October 28, 2003, Covad filed a Motion for Reconsideration regarding one aspect of the Commission's decision. Economy and efficiency would be served if the Commission's decision on the Motion, which is scheduled for release on December 23, 2003, could be incorporated into the final Agreement submitted for approval.

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- 4. Thus, Covad requests that the Commission permit the parties to file their Interconnection Agreement 21 days after the entry of the Commission's Order on Reconsideration.
- 5. Covad has discussed this matter with counsel for Verizon who concurs in the request for an extension of time described in this Motion.

COVAD COMMUNICATIONS COMPANY

Charles Watkins

Covad Communications Co.

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Attorneys for DIECA Communications, Inc. d/b/a Covad Communications Company

CERTIFICATE OF SERVICE

- I HEREBY CERTIFY that a true and correct copy of the foregoing DIECA Communications, Inc. d/b/a Covad Communications Company's Motion for Extension of Time to File Interconnection Agreement has been provided by (*) hand delivery (**) electronic mail or U.S. Mail this 7th day of November 2003, to the following:
- (*) (**) Lee Fordham Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850
- (*) (**) David Christian Verizon Florida, Inc. 106 East College Avenue, Suite 810 Tallahassee, Florida 32301
- (**) Richard Chapkis Verizon Communications 201 North Franklin Street Tampa, Florida 33601-0100
- (**) Steven H. Hartmann Verizon Communications, Inc. 1320 House Road, 8th Floor Arlington, Virginia 22201
- (**) Kellogg Huber Law Firm Aaron Panner/Scott Angstreich 1615 M. Street, NW, Suite 400 Washington, DC 20036

Vicki Gordon Kaufman