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December 23, 2003

BY HAND DELIVERY

Ms. Blanca Bayó, Director The Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Docket No. 000121-TP – BellSouth Performance Measurements

Dear Ms. Bayó:

Re:

Enclosed for filing are an original and fifteen (15) copies of AT&T's Motion for Extension of Time to file its Response to BellSouth's Amended Motion to Modify SEEM Plan and Request to Offset or Escrow Penalty Plans in the above-referenced docket.

Please acknowledge receipt of this letter 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,

Tracy W. Hatch

TWH/las Enclosure

cc: Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the)	Docket No. 000121A-TP
Establishment of Operations Suppo	ort)	
Systems Permanent Performance)	Filed: December 23, 2003
Measures for Incumbent Local)	
Exchange Telecommunications)	
Companies)	
)	

AT&T'S REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE TO BELLSOUTH'S AMENDED MOTION TO MODIFY SEEM PLAN AND REQUEST TO OFFSET OR ESCROW PENALTY PLANS

AT&T Communications of the Southern States, LLC (hereinafter "AT&T"), by and through undersigned counsel, pursuant to Rule 28-106.204, Florida Administrative Code, respectfully moves the Commission for an extension of time to file its Response to BellSouth Telecommunications Inc.'s (hereinafter "BellSouth") Amended Motion to Modify SEEM Plan and Request to Offset or Escrow Penalty Plans, filed on December 18, 2003. In support of its Motion, AT&T states:

- 1. BellSouth filed its Amended Motion to Modify SEEM Plan and Request to Offset or Escrow Penalty Plans on December 18, 2003.
- 2. BellSouth served the Amended Motion on AT&T by U.S. Mail on December 18, 2003. AT&T actually received the Amended Motion on December 22, 2003. Pursuant to Florida Administrative Code, AT&T has only seven (7) calendar days plus five (5) calendar days for mailing to file its response to BellSouth's Amended Motion.
- 3. AT&T's counsel and subject matter experts have substantial work and travel conflicts over the next two weeks. This coupled with the reduced availability of needed personnel during

the holidays, AT&T requires additional time to prepare AT&T's response to BellSouth's Amended Motion.

- 4. Therefore, AT&T requests an extension of time to file its response to BellSouth's Amended Motion until January 8, 2004.
- 5. Since there are no Commission proceedings currently scheduled in this docket, there would be no prejudice to any party in granting the delay.

WHEREFORE, based on the foregoing, AT&T requests that the Commission grant AT&T an extension of time, until January 8, 2004, to file its response to BellSouth's Amended Motion.

Respectfully submitted this 23rd day of December 2003.

TRACY W. HATCH, ESQ.

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Attorney for AT&T Communications of the Southern States, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail on this 23rd day of December 2003 to:

(*) Blanca S. Bayo Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 3239-0850

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