MCWHIRTER REEVES

ORIGINAL

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL. 33601-3350 (813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

February 19, 2004

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) and Verizon Florida, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

> Joint Motion of DIECA Communications Inc. d/b/a Covad Communications Company and Verizon Florida, Inc. for Extension of Time to File Interconnection Agreement.

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

Sincerely,

Willi Gram Laufman Vicki Gordon Kaufman

AUS CAF -VGK/bae CMP Enclosures COM CTR ECR

-cc: Richard Chapkis

GCL OPC MMS

RECEIVED & Files

DOCUMENT NUMBER -

02415 FEB 1

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: February 19, 2004

Joint Motion of DIECA Communications, Inc. d/b/a Covad Communications Company And Verizon Florida, Inc. for Extension of Time to File Interconnection Agreement

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) and Verison Florida, Inc. (Verizon) (jointly, Movants), pursuant to rule 28-106.204, Florida Administrative Code, request that the Commission grant them a 35-day extension of time to file their Interconnection Agreement in this matter. As grounds therefore, Movants state:

- 1. In Order No. PSC-03-1296-PCO-TP, the Commission granted the Movants' motion for extension of time to file their Interconnection Agreement until 21 days following the issuance of its order ruling on Covad's motion for reconsideration.
- 2. That order, Order PSC-04-0106-FOF-TP (disposing of Covad's motion for reconsideration), was entered on January 30, 2004. Pursuant to the Order, the parties are required to file their Interconnection Agreement by February 20, 2004.
- 3. The parties have diligently attempted to meet this deadline. However, due to pressing demands, including preparation for the numerous Triennial Review proceedings around the country, Movants will be unable to submit an executed Interconnection Agreement by the February 20, 2004 deadline.

02415 FEB 19:

4. Thus, Movants request that the Commission permit them to file their Interconnection Agreement 35 days from the current February 20, 2004 deadline.

Uillie Andre Laufman Charles Watkins

Covad Communications Co.

1230 Peachtree Street, N.E., 19th Floor

Atlanta, GA 30309

Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, P.A. 117 South Gadsden Street Tallahassee, FL 32301

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

Richard Chapkis Verizon Communications 201 North Franklin Street Tampa, Florida 33601-0100

Attorney for Verizon Florida, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Motion of DIECA Communications, Inc. d/b/a Covad Communications Company and Verizon Florida, Inc.'s for Extension of Time to File Interconnection Agreement has been provided by (*) hand delivery or U.S. Mail this 19^h day of February 2004 to the following:

(*) (**) Lee Fordham Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

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