

ORIGINAL

Kay Flynn

From: Michelle Blanton [mblanton@mac-law.com]
Sent: Wednesday, July 21, 2004 4:25 PM
To: Filings@psc.state.fl.us
Cc: Vicki Gordon Kaufman; james.meza@bellsouth.com; Patty Christensen; aleiro@idstelcom.com; Joseph McGlothlin (E-mail)
Subject: Docket No. 040611-TP

Pursuant to the Commission's procedures for e-filing , IDS Telcom LLC provides the following information:

a. The attorney responsible for this filing is:

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b. The document is to be filed in Docket No. 040611-TP In Re: Request for approval of amendment to interconnection, unbundling, resale and collocation agreement between IDS Telcom LLC and BellSouth Telecommunications, Inc.

c. The document is filed on behalf of IDS Telecom LLC.

d. The document is 3 pages long.

e. The document is: Motion of IDS Telcom, LLC for Extension of Time.

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 SEC 1
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Done
07/23/04 ✓
 7/22/2004

DOCUMENT NUMBER - DATE

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for approval of amendment)
to interconnection, unbundling, resale, and) Docket No. 040611-TP
collocation agreement between IDS Telcom) Filed: July 21, 2004
LLC and BellSouth Telecommunications, Inc.)
_____)

MOTION OF IDS TELCOM, LLC FOR EXTENSION OF TIME

Pursuant to Rule 28-106.204, Florida Administrative Code, IDS Telcom, LLC (“IDS”), through its undersigned counsel, requests the Commission to extend the time for the filing of IDS’ response to BellSouth Telecommunications, Inc.’s (“BellSouth”) Opposition to Request for Approval of Interconnection Amendment (“Opposition to Request”), and in support states:

1. On June 25, 2004, IDS filed its request for approval of an Amendment to the Agreement Between IDS and BellSouth. Through this amendment, IDS intended to adopt, pursuant to Section 252(i) of the Telecommunications Act of 1996, a certain feature of the interconnection agreement between BellSouth and Supra Telecommunications & Information Services, Inc.

2. On July 15, 2004, BellSouth filed its Opposition to Request. Within this pleading, BellSouth requested, *inter alia*, that the Commission dismiss IDS’ filing, impose sanctions on IDS, and schedule an evidentiary hearing.

3. The current deadline for the filing of IDS’ response to these aspects of BellSouth’s Opposition to Request is July 22, 2004.

4. IDS’ Request for Approval of Adoption is related to the issues in Docket No. 040488-TP. At the parties’ request, and to provide an opportunity for the parties to attempt to negotiate a settlement, in that docket the Commission recently deferred its

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consideration of Staff's recommendation until August 3, 2004. If the negotiations made possible by the deferral are successful, IDS will withdraw the amendment that is the subject of BellSouth's Opposition to Request in this docket, thereby obviating the need for IDS to respond to BellSouth's pleading. No party will be prejudiced by the extension, and the short extension may result in conserving resources of the parties and the Commission. Accordingly, IDS respectfully requests the Commission to extend the deadline for the filing of IDS' response to and including August 6, 2004. This date falls only three days after the date on which the Commission is currently scheduled to consider Staff's recommendation in Docket No. 040488-TP.

5. IDS has conferred with BellSouth and is authorized to represent that BellSouth does not object to the extension sought herein.

WHEREFORE, IDS requests the Commission to enter an order extending the deadline for the filing of IDS' response to BellSouth's Opposition to Request to and including August 6, 2004.

s/ Joseph A. McGlothlin
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Attorneys for IDS Telecom, LLC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion of IDS
Telcom, LLC. for Extension of Time has been served upon the following parties by
electronic mail and U.S. mail this 21st day of July, 2004.

Patricia Christensen
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Nancy B. White
c/o Ms. Nancy H. Sims
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s/ Joseph A. McGlothlin
Joseph A. McGlothlin