

**ORIGINAL**

**Matilda Sanders**

**From:** Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]  
**Sent:** Monday, January 24, 2005 11:19 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** Meza, James; Vicki Gordon Kaufman; Peters, Evelyn; Holland, Robyn P; Nancy Sims; Bixler, Micheale  
**Subject:** Docket 041114-TP Joint Motion  
**Importance:** High

- A. Brenda Slaughter  
 Legal Secretary for James Meza III  
 BellSouth Telecommunications, Inc.  
 c/o Nancy Sims  
 150 South Monroe, Rm. 400  
 Tallahassee, Florida 32301-1558  
 (404) 335-0714  
[brenda.slaughter@bellsouth.com](mailto:brenda.slaughter@bellsouth.com)
- B. Docket No. 041114-TP: Complaint of XO Florida, Inc. Against BellSouth Telecommunications, Inc. for Refusal to Convert Circuits to UNEs and for Expedited Processing
- C. BellSouth Telecommunications, Inc.  
 on behalf of James Meza III
- D. 5 pages total
- E. Joint Motion of Time for BellSouth and XO to Respond to Staff's Second Set of Interrogatories and Second Requests for Production to Parties

Brenda Slaughter (on behalf of James Meza III)

BellSouth Telecommunications, Inc.

Suite 4300 - Legal Department

3675 W. Peachtree Street

Atlanta, GA 30375-0001

Phone: (404) 335-0714

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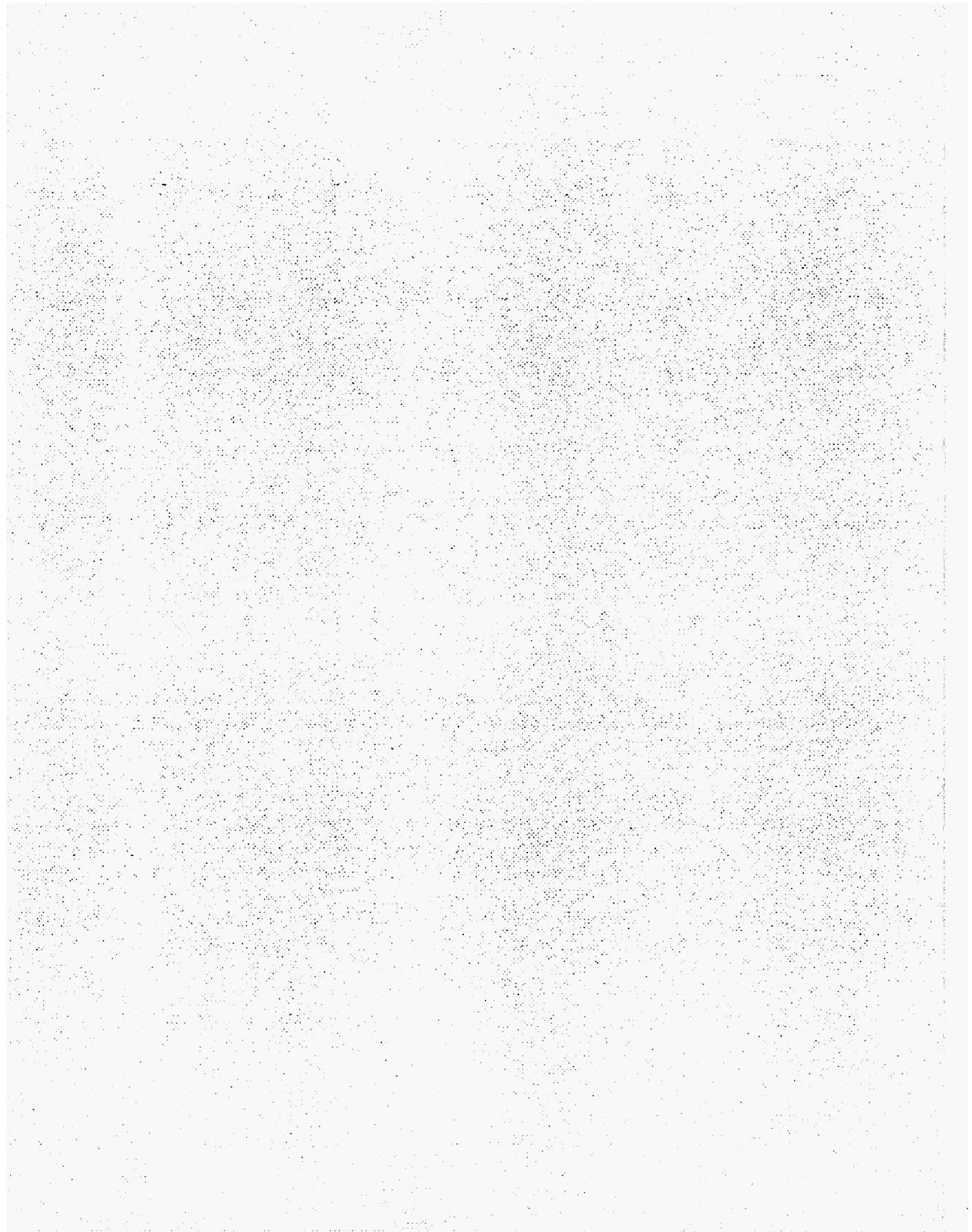
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Legal Department

JAMES MEZA III  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0769

January 24, 2005

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: 041114-TP – Complaint of XO Florida, Inc. Against  
BellSouth Telecommunications, Inc. for Refusal to Convert  
Circuits to UNEs and for Expedited Processing**

Dear Ms. Bayó:

Enclosed is a Joint Motion for Extension of Time to respond to Staff discovery, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
James Meza III (B) (S)

Enclosures

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

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE  
DOCKET NO. 041114-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 24th day of January, 2005 to the following:

Jason Rojas  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6179  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)

Vicki Gordon Kaufman (+)  
McWhirter Reeves McGlothlin  
Davidson Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Represents XO

Dana Shaffer  
XO Florida, Inc.  
VP, Regulatory Counsel  
105 Molloy Street, Ste. 300  
Nashville, TN 37201  
Tel. No. (615) 777-7700  
Fax. No. (615) 850-0343  
[dana.shaffer@xo.com](mailto:dana.shaffer@xo.com)

  
James Meza III (B88)

**(+) SIGNED PROTECTIVE AGREEMENT**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of XO Florida, Inc.	)	Docket No.: 041114-TP
Against BellSouth Telecommunications, Inc. for	)	
Refusal to Convert Circuits to UNEs and for	)	
Expedited Processing	)	
	)	Filed: January 24, 2005

**JOINT MOTION FOR EXTENSION OF TIME**

BellSouth Telecommunications, Inc. ("BellSouth") and XO Florida, Inc. ("XO"), pursuant to Rule 28-106.204(5), Florida Administrative Code, jointly request that the Florida Public Service Commission ("Commission") grant them a one week extension of time or until February 8, 2004 in which to file Responses to Florida Public Service Commission Staff's ("Staff") Second Set of Interrogatories and Second Request For Production to the parties. In support of this motion, the parties state the following:

1. Staff served its Second Set of Interrogatories and Second Request For Production on BellSouth and XO on January 12, 2005. Pursuant to Order No. PSC-04-1147-PCO-TP ("Procedural Order"), objections and responses to this discovery are due February 1, 2005.

2. BellSouth requests this extension of time because the undersigned was in a multi-day hearing in North Carolina the week the discovery was issued, was preparing rebuttal testimony and appearing in Tennessee for a hearing the following week, and will be in Tennessee for a hearing the week prior to the date the discovery responses are due. Accordingly, BellSouth has not had sufficient time to review and prepare responses to the multiple discovery requests propounded by Staff.

3. XO requests an extension of time because the Staff requests are extensive and detailed. The XO personnel responsible for gathering the information will need additional time beyond the expedited 20 day time frame to compile, review and complete the responses.

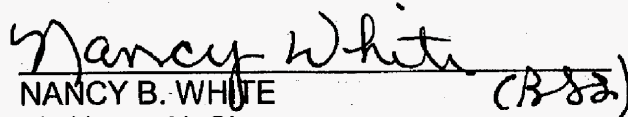
4. No party would be prejudiced by this brief extension of time.


5. The parties have notified Staff of this request for the extension of time and Staff has no objections.

**WHEREFORE**, for the foregoing reasons, the parties respectfully request that the Commission grant BellSouth and XO a one week extension of time in which to file the aforementioned objections and responses.

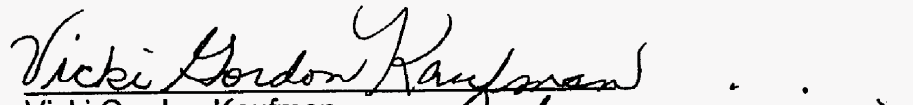
Respectfully submitted this 24th day of January, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
NANCY B. WHITE (BSS)  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

  
R. DOUGLAS LACKEY (BSS)  
JAMES MEZA III  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0769

COUNSEL FOR XO

  
Vicki Gordon Kaufman (by permission BSS)  
McWhirter Reeves McGlothlin  
Davidson Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525

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