

Matilda Sanders

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From: terry.scobie@verizon.com
Sent: Friday, February 10, 2006 12:19 PM
To: Filings@psc.state.fl.us
Cc: leigh.a.hyer@verizon.com; David Christian; demetria.c.watts@verizon.com; frank.app@verizon.com
Subject: Docket No. 020960-TP - Verizon Florida/Covad Joint Motion for Extension of Time
Attachments: 020960-VZ FL-Covad Joint Motion for Extension.pdf



020960-VZ
Covad Joint Mot

The attached filing is submitted in Docket No. 020960-TP on behalf of Verizon Florida Inc. and Covad Communications Company by

Leigh A. Hyer
 P. O. Box 110, FLTC0007
 Tampa, Florida 33601
 (813) 483-1256
 leigh.a.hyer@verizon.com

The attached .pdf document contains 5 pages - transmittal letter (1 page), certificate of service (1 page), and Joint Motion for Extension of Time (3 pages).

(See attached file: 020960-VZ FL-Covad Joint Motion for Extension.pdf)

Terry Scobie
 Executive Adm. Assistant
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February 10, 2006 – VIA ELECTRONIC MAIL

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

Re: Docket No. 020960-TP
Petition for Arbitration of open issues resulting from interconnection negotiations
with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a Covad
Communications Company

Dear Ms. Bayo:

Enclosed for filing in the above matter is a Joint Motion for Extension of Time on behalf
of Verizon Florida Inc. and DIECA Communications, Inc. d/b/a Covad Communications
Company. Service has been made as indicated on the Certificate of Service. If there
are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

s/ Leigh A. Hyer

Leigh A. Hyer

LAH:tas
Enclosures

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Joint Motion for Extension of Time in Docket No. 020960-TP were sent via U.S. mail on February 10, 2006 to

Staff Counsel
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s/Leigh A. Hyer

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of open issues)
resulting from interconnection negotiations) Docket No. 020960-TP
with Verizon Florida Inc. by DIECA) Filed: February 10, 2006
Communications, Inc. d/b/a Covad)
Communications Company)
_____)

JOINT MOTION FOR EXTENSION OF TIME

Verizon Florida Inc. (Verizon) and DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) hereby jointly move this Commission for an extension of time to file an interconnection agreement in this arbitration proceeding until ninety (90) days following the issuance of its order approving a final interconnection amendment in Docket No. 040156-TP.

With respect to the vast majority of the Commission's determinations in this docket, Verizon and Covad were able to draft agreed-upon language consistent with the Commission's final order on arbitration (PSC-03-1139-FOF-TP) issued October 13, 2003. Nonetheless, the parties were not able to reach agreement on how to address the changes from the FCC's Triennial Review Order ("TRO") in the interconnection agreement.

The terms and conditions for amendments to interconnection agreements to incorporate the FCC's rules in the TRO are currently being addressed by the Commission in Docket No. 040156-TP. Verizon and Covad agree that final approval of the specific terms of the amendments in Docket No. 040156-TP is necessary for the parties to finalize their conforming interconnection agreement in a manner consistent with that docket. In Order No. PSC-04-0396-PCO-TP issued on April 14, 2004, the

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Commission granted the parties' joint motion for extension of time to file the interconnection agreement until thirty (30) days following the issuance of the Commission's final order in Docket No. 040156-TP. The Commission has not yet approved the final language in that docket, and as a result, this arbitration proceeding has been inactive for almost two years.

Therefore, to allow the parties sufficient time to review both the previously agreed-upon language and to incorporate the rulings of the Commission in Docket No. 040156-TP into their conforming agreement, Verizon and Covad respectfully request that the Commission extend the time for filing a conforming agreement to ninety (90) days after issuance of its order approving the final interconnection agreement amendment terms in Docket No. 040156-TP.

As both parties join in this request, no party will be prejudiced by this extension.

WHEREFORE, for the foregoing reasons, Verizon and Covad respectfully request that this Commission extend the time for filing an executed, conforming amendment to ninety (90) days following the issuance of its order approving a final interconnection amendment in Docket No. 040156-TP.

Respectfully submitted on February 10, 2006.

By: s/ Leigh A. Hyer
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and

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