

ORIGINAL

Dorothy Menasco

From: Peg Griffin [pgriffin@moylelaw.com]
Sent: Monday, February 20, 2006 4:38 PM
To: Filings@psc.state.fl.us
Cc: Vicki Gordon Kaufman; Adam Teitzman; Michael Barrett; Michael Gross; Nancy Sims; Nancy White; Meredith.mays@bellsouth.com; nhorton@lawfla.com; jheitmann@kelleydrye.com; ghargrave@kelleydrye.com; Kris.Shulman@xo.com; Donna McNulty; De.oroark@mci.com; fself@lawfla.com; steve.chaiken@stis.com; mfeil@mail.fdn.com; marsha@reuphlaw.com; manascoro@gru.com; cguyton@steelhector.com; adam.kupetsky@wiltel.com; jsm@thlglaw.com; bmagness@phonelaw.com; GWatkins@Covad.com; Everett.boyd@sablaw.com; David.adelman@sablaw.com; jkrutchik@ststelecom.com
Subject: E-filing - Docket 041269-TP
Attachments: Response to Motion to Amend Filing Date.pdf

Attorney responsible for filing: Vicki Gordon Kaufman
 118 N. Gadsden Street
 Tallahassee, FL 32301
 Telephone: (850) 681-3828
 Facsimile: (850) 681-8788
 vkaufman@moylelaw.com

Docket No and title: In Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting from Changes of Law
 Docket 041269-TP

Filed on behalf of: DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad")

Number of pages: 4
 Document attached: Response to BellSouth Telecommunications, Inc.'s Motion to Amend Filing Date for Interconnection Agreement Amendments

CMP _____
 COM 3
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 RCA _____
 SCR _____
 SGA _____
 SEC 1
 OTH Kimp

Peg G. Griffin
 Assistant to Vicki Gordon Kaufman
 Moyle, Flanigan, Katz, Raymond White & Krasker, P.A.
 118 N. Gadsden Street
 Tallahassee, FL 32301
 Telephone: (850) 681-3828
 Facsimile: (850) 681-8788
 E-mail: pgriffin@moylelaw.com

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein.

The information contained in this electronic mail transmission may be attorney/client privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone collect at 850-681-3828. Thank you.

DOCUMENT NUMBER-DATE

01481 FEB 20 06

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:
Petition to Establish Generic
Docket to Consider Amendments
To Interconnection Agreements
Resulting from Changes of Law

Docket No. 041269-TP
Filed: February 20, 2006

**Covad Communications Company's Response to
BellSouth Telecommunications, Inc.'s Motion to Amend Filing Date
For Interconnection Agreement Amendments**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), hereby responds to BellSouth Telecommunications, Inc.'s (BellSouth) Motion to Amend Filing Date for Interconnection Agreement Amendments. In response, Covad states:

1. On February 7, 2006, the Commission made an oral decision in this docket. Among other things, that decision purported to require parties to execute interconnection agreement amendments by February 27, 2006.

2. On February 17, 2006, a recommendation was filed in the above docket, recommending that the Commission vacate certain portions of its decision in this matter due to misconduct by a Commission Staff member assigned to this docket. Staff also recommended that the Commission now require the filing of amendments by March 2, 2006.

3. The Commission is scheduled to vote on Staff's recommendation on February 28, 2006.

4. On February 17, 2006, BellSouth filed a motion asking the Commission to modify the filing dates for amendments to March 2, 2006.

5. While Covad agrees that the February 27th date is inappropriate and must be modified, the moving of the date by a mere two (2) days is insufficient. This fails to

FILED FEB 20 2006

01481 FEB 20 06

move the compliance date out far enough to permit an appeal or other appropriate action to be taken in the event that the Staff recommendation is not adopted on February 28th.

6. Thus, Covad requests that the date be extended to March 10, 2006.

s/ Charles E. (Gene) Watkins
Charles E. (Gene) Watkins
Covad Communications Co.
1230 Peachtree Street, NE
Suite 1900
Atlanta, GA 30309
GWatkins@Covad.com

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond Krasker &
White, PA
118 North Gadsden Street
Tallahassee, Florida 32301
vkaufman@moylelaw.com

Attorneys for Covad

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Response to Motion to Amend Filing Date was served via electronic mail and U.S. mail this 20th day of February, 2006, to the following:

Adam Teitzman
Michael Barrett
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850
ateitzma@psc.state.fl.us
mbarrett@psc.state.fl.us

Michael A. Gross
Florida Cable Telecommunications
Assoc., Inc.
246 E. 6th Avenue, Suite 100
Tallahassee FL 32303
mgross@fcta.com

Nancy White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Nancy.sims@bellsouth.com
Nancy.white@bellsouth.com
Meredith.mays@bellsouth.com

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee FL 32302-1876
nhorton@lawfla.com

John Heitmann
Garret R. Hargrave
Kelley Drye & Warren, LLP
1200 19th Street, N.W., Suite 500
Washington DC 20036
jheitmann@kelleydrye.com
ghargrave@kelleydrye.com

Kris Shulman
XO Communications, Inc.
105 Molloy Street, Suite 300
Nashville TN 37201
Kris.Shulman@xo.com

De O'Roark
MCI
6 Concourse Parkway, Suite 600
Atlanta GA 30328
De.oroark@mci.com

Floyd Self
Messer, Caparello & Self, P.A.
215 Soth Monroe Street, Suite 701
P.O. Box 1876
Tallahassee FL 32302-1876
fself@lawfla.com

Marva Johnson
Supra Telecommunications and
Info. Systems, Inc.
General Counsel
2901 S.W. 149th Avenue, Suite 300
Miramar FL 33027
Marva.johnson@supratelecom.com

Matthew Feil
FDN Communications
2301 Lucien Way, Suite 200
Maitland FL 32751
mfeil@mail.fdn.com

D. Anthony Mastando
ITC^DeltaCom Communications, Inc.
7037 Old Madison Pike, Suite 400
Huntsville AL 35806

Marsha E. Rule
Rutledge Ecenia Purnell & Hoffman,
P.A.
P.O. Box 551
Tallahassee FL 32301-0551
marsha@reuphlaw.com

Raymond O. Manasco, Jr.
Gainesville Regional "Utilities"
P.O. Box 147117
Station A-138
Gainesville FL 32614-7117
manascoro@gru.com

Charles A. Guyton
Squire, Sanders & Dempsey L.L.P.
215 S. Monroe Street, Suite 601
Tallahassee FL 32301-1804
cguyton@steelhector.com

Adam Kupetsky
Regulatory Counsel
WilTel Communications, LLC
One Technology Center (TC-15)
100 South Cincinnati
Tulsa OK 74103
adam.kupetsky@wiltel.com

Jonathan S. Marashlian
The Helein Law Group, LLP
8180 Greensboro Drive, Suite 700
McLean VA 22102
jsm@thlglaw.com

Bill Magness
Casey Law Firm
98 San Jacinto Blvd., Suite 1400
Austin, TX 78701
bmagness@phonelaw.com

Charles (Gene) Watkins
Covad Communications Company
1230 Peachtree Street NE, Suite 1900
Atlanta, GA 30309
GWatkins@Covad.com

C. Everett Boyd, Jr.
Sutherland Asbill Law Firm
3600 Maclay Blvd. S., Suite 202
Tallahassee, FL 32312-1267
Everett.boyd@sablaw.com

D. Adelman/C. Jones/F. LoMonte
Sutherland Law Firm
999 Peachtree Street, NE
Atlanta, GA 30309
David.adelman@sablaw.com

AzulTel, Inc.
2200 S. Dixie Highway, Suite 506
Miami, FL 33133-2300

STS Telecom
12233 S.W. 55th Street, #811
Cooper City, FL 33330-3303
jkrutchik@ststelecom.com

s/Vicki Gordon Kaufman
Vicki Gordon Kaufman