

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

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.

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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:

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