

Timolyn Henry

ORIGINAL

From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]
Sent: Friday, March 10, 2006 4:40 PM
To: Filings@psc.state.fl.us
Cc: Meza, James; Linda Hobbs; Holland, Robyn P; Fatool, Vicki; Nancy Sims; Bixler, Micheale; Mays, Meredith; William Atkinson; Adam Kupetsky; Adam Teitzman; Alan Gold; Bill Magness; Charles Guyton; Dana Shaffer; Dulaney O'Roark; Floyd Self; Garrett Hargrave; Gene Watkins; John Heitmann; Jonathan Marashlian; Ken Hoffman; Marsha Rule; Martin McDonnell; Matt Feil; Michael Barrett; Michael Gross; Nanette Edwards; Norman Horton; Raymond Manasco; Sonia Daniels; Steve Chaiken; Susan Masterton; Tony Mastando; Tracy Hatch; Vicki Gordon Kaufman; Wanda Montano
Subject: Docket 041269-TP
Importance: High
Attachments: 041269-TP Joint Motion Extension of Time to file I-A.pdf

A. Brenda Slaughter
 Legal Secretary to James Meza III
 BellSouth Telecommunications, Inc.
 150 South Monroe Street
 Suite 400
 Tallahassee, Florida 32301
 (404) 335-0714
brenda.slaughter@bellsouth.com

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

B. Docket No. 041269-TP
 Petition to Establish Generic Docket to Consider Amendments to Interconnection
 Agreements Resulting from Changes of Law

C. BellSouth Telecommunications, Inc.
 on behalf of James Meza, III

D. 7 pages total (includes letter, certificate of service and pleading)

E. Joint Motion for Extension of Time to file executed Interconnection Agreements

<<041269-TP Joint Motion Extension of Time to file I-A.pdf>>

DOCUMENT NUMBER - DATE
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 FPSC-COMMISSION CLERK

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3/10/2006

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JAMES MEZA III
Senior Regulatory Counsel

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

ORIGINAL

March 10, 2006

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

Re: Docket No. 041269-TP
In re: **Petition to Establish Generic Docket to Consider Amendments to
Interconnection Agreements Resulting From Changes of Law**

Dear Ms. Bayo:

Enclosed is a Joint Motion for Extension of Time to file the executed
Interconnection Agreements, 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 (BMS)

cc: All Parties of Record
Jerry D. Hendrix
R. Douglas Lackey
Nancy B. White

DOCUMENT NUMBER-DATE

02113 MAR 10 06

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CERTIFICATE OF SERVICE
Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U. S. Mail this 10th day of March, 2006 to the following:

Adam Teitzman
Michael Barrett
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6199
ateitzma@psc.state.fl.us
mbarrett@psc.state.fl.us

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
246 E. 6th Avenue
Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax No. (850) 681-9676
mgross@fcta.com

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond
& Sheehan, PA
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@moylelaw.com
Atty. for FCCA/CompSouth

Norman H. Horton, Jr.
Meser, Caparello & Self, P.A.
215 South Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax No. (850) 224-4359
nhorton@lawfla.com
Represents NuVox/NewSouth/Xspedius

John Heitmann
Garret R. Hargrave
Kelley Drye & Warren, LLP
Suite 500
1200 19th Street, N.W.
Washington, D.C. 20036
jheitmann@kelleydrye.com
ghargrave@kelleydrye.com
Tel. No. (202) 887-1254
Represents NuVox/NewSouth/Xspedius

Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Rutledge, Ecenis, Purnell & Hoffman
P.O. Box 551
Tallahassee, FL 32302
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
Represents XO
ken@reuphlaw.com
marty@reuphlaw.com

Dana Shaffer
XO Communications, Inc.
105 Molloy Street, Suite 300
Nashville, Tennessee 37201
Tel. No. (615) 777-7700
Fax. No. (615) 850-0343
dana.shaffer@xo.com

Donna Canzano McNulty, Esq.
MCI
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301
Telephone: 850 219-1008
donna.mcnulty@mci.com

De O'Roark, Esq. (+)
MCI
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
de.oroark@mci.com

Floyd Self, Esq.
Messer, Caparello & Self, P.A.
Hand: 215 South Monroe Street
Suite 701
Tallahassee, FL 32301
Mail: P.O. Box 1876
Tallahassee, FL 32302-1876
fself@lawfla.com

Steven B. Chaiken
Supra Telecommunications and
Info. Systems, Inc.
General Counsel
2901 S.W. 149th Avenue
Suite 300
Miramar, FL 33027
Tel. No. (786) 455-4239
steve.chaiken@stis.com

Matthew Feil (+)
FDN Communications
2301 Lucien Way
Suite 200
Maitland, FL 32751
Tel. No. (407) 835-0460
mfeil@mail.fdn.com

Tony Mastando, Esq. (+)
Director - Regulatory
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
Fax. No. (256) 382-3936
tony.mastando@itcdeltacom.com

Raymond O. Manasco, Jr.
Gainesville Regional Utilities
Hand: 301 S.E. 4th Avenue
Gainesville, FL 32601
Mail: P.O. Box 147117, Station A-138
Gainesville, FL 32614-7117
Tel. No. (352) 393-1010
Fax No. (352) 334-2277
manascoro@gru.com

Charles A. Guyton
Steel Hector & Davis LLP
215 South Monroe Street
Suite 601
Tallahassee, FL 32301-1804
Tel. No. (850) 222-2300
Fax. No. (850) 222-8410
cguyton@steelhector.com
Atty. for City of Gainesville

Adam Kupetsky
Regulatory Counsel
WiITel Communications, LLC
One Technology Center (TC-15)
100 South Cincinnati
Tulsa, Oklahoma 74103
Tel. No. (918) 547-2764
Fax. No. (918) 547-9446
adam.kupetsky@wiiitel.com

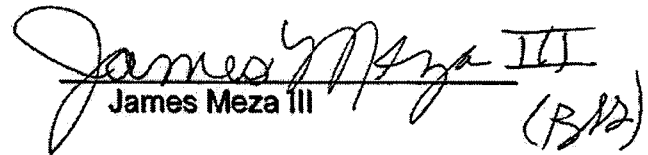
Jonathan S. Marashlian, Esq.
The Helein Law Group, LLLP
8180 Greensboro Drive, Suite 700
McLean, VA 22102
Tel. No. (703) 714-1313
Fax. No. (703) 714-1330
ism@thlglaw.com
Atty. for Azul Tel.

Charles (Gene) E. Watkins (+)
Senior Counsel
Government & External Affairs
Covad Communications Company
1230 Peachtree Street NE
Suite 1900
Atlanta, GA 30309
Tel. No. (678) 528.6816
Fax No. (678) 528.6806
Cell No. (404) 915.0018
g Watkins@covad.com

Bill Magness
bmagness@phonelaw.com

William R. Atkinson
Sprint Nextel
3065 Cumberland Circle
Atlanta, GA 30339
Tel. No. (404) 649-4882
Fax. No. (404) 649-1652
bill.atkinson@sprint.com

Marsha E. Rule
Rutledge, Ecenia, Purnell & Hoffman, P.A.
Post Office Box 551
Tallahassee, FL 32301-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
marsha@reuphlaw.com
Counsel for Sprint Nextel


James Meza III (B/S)

(+)signed Protective Agreement
(*) via FedEx

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re:)	
)	Docket No. 041269-TL
Petition to Establish Generic Docket to)	
Consider Amendments to Interconnection)	
Agreements Resulting From Changes of Law)	Filed: March 10, 2006
_____)		

JOINT MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"), NewSouth Communications Corp., NuVox Communications Corp., and Xspedius Communications, LLC (collectively referred to as "Joint Petitioners") jointly ask the Florida Public Service Commission ("Commission") for an extension of time in which to execute and file executed interconnection agreements. In support of this Joint Motion, the parties state the following:

1. Pursuant to Order No. PSC-06-0172-FOF-TP, the parties are required to file executed amendments to the parties' current interconnection agreements or new interconnection agreements on March 10, 2006. However, because the parties have arbitrated and will shortly execute new interconnection agreements to reflect, as to unresolved issues, the Commission's decision in Docket No. 040130-TP ("Arbitration Docket") and the instant docket, and because the parties need additional time to negotiate and incorporate the Commission's decisions as to their unresolved issues, the parties request that they be allowed to file the new agreements on March 31, 2006.¹ The new agreements will incorporate with respect to previously unresolved issues the Commission's decision in the Arbitration Docket and this docket. Thus, by filing the new executed interconnections agreement on March 31,

¹ Pursuant to Order No. 05-1247-PCO-TP, the parties are required to file the new interconnection agreement within 30 days of the Commission's issuance of its order in Docket No. 041269-TP.

2006, there would not be a need to file amendments to the existing interconnection agreements.

2. Consistent with Order No. PSC-06-0172-FOF-TP, the parties have also agreed that the new agreements will be effective as of March 11, 2006. Thus, this request for a brief extension of time will not materially alter the Commission's filing requirements in Order No. PSC-06-0172-FOF-TP.


3. Further, because the Joint Petitioners and BellSouth are both seeking this extension, no party will be prejudiced by this request for an extension. In addition, because the effective date of the new interconnection agreements will be March 11, 2006, the new agreements will have the same effective date as would amendments to the existing interconnection agreements.

4. By filing this Motion, none of the parties waive any arguments or rights they may have regarding application or the effectiveness of Order No. PSC-06-0172-FOF-TP on any party.

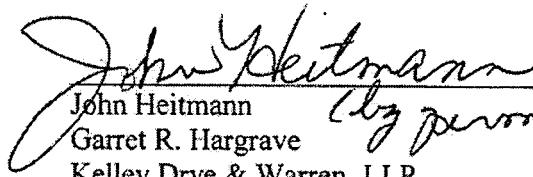
WHEREFORE, for the foregoing reasons, BellSouth and the Joint Petitioners respectfully request that this Commission grant them an extension until March 31, 2006 to file new interconnection agreements memorializing and incorporating the Commission's decision in the instant docket with respect to previously unresolved issues and the Arbitration Docket.

Respectfully submitted, this 10th day of March, 2006.

COMPETITIVE CARRIERS OF THE SOUTH, INC.


Norman H. Horton, Jr. *(by permission - BSS)*

Meser, Caparello & Self, P.A.
215 South Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720
Represents NuVox/NewSouth/Xspedius


John Heitmann *(by permission - BSS)*

Garret R. Hargrave
Kelley Drye & Warren, LLP
Suite 500
1200 19th Street, N.W.
Washington, D.C. 20036
(202) 887-1254
Represents NuVox/NewSouth/Xspedius

BELLSOUTH TELECOMMUNICATIONS, INC.


E. DOUGLAS LACKEY *(BSS)*
MEREDITH E. MAYS

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

#625605