

ORIGINAL

Timolyn Henry

From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]

Sent: Wednesday, March 15, 2006 3:26 PM

To: Filings@psc.state.fl.us

Cc: Meza, James; Patrick Wiggins; Vicki Gordon Kaufman; Mark Mansour; Linda Hobbs; Fatool, Vicki; Holland, Robyn P; Nancy Sims; Bixler, Micheale

Subject: Docket 060068-TP

Importance: High

Attachments: 060068-TP BST 2nd Unopposed Motion for Extension.pdf

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 OPC _____
 RCA _____
 SCR _____
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 SEC 1
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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

B. Docket No.: 060068-TP Complaint of National Telecom & Broadband Services, LLC against BellSouth Telecommunications, Inc. for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service

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

D. 4 pages total (includes letter, certificate of service and pleading)

E. BellSouth Telecommunications, Inc.'s Second Unopposed Motion for Extension of Time to File Responsive Pleadings

<<060068-TP BST 2nd Unopposed Motion for Extension.pdf>>

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3/15/2006

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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

March 15, 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. 060068-TP**
**Complaint of National Telecom & Broadband Services,
LLC against BellSouth Telecommunications, Inc. for
Breach of Interconnection Agreement and Petition for
Emergency Order Restoring Service**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Second Unopposed Motion for Extension of Time to File a Responsive Pleading, which we ask that you file in the captioned docket.

A copy has been served to all parties of record.

Sincerely,


James Meza III

Enclosures

cc: All parties of record
Jerry D. Hendrix
Nancy B. White
R. Douglas Lackey

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE
DOCKET NO. 060068-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

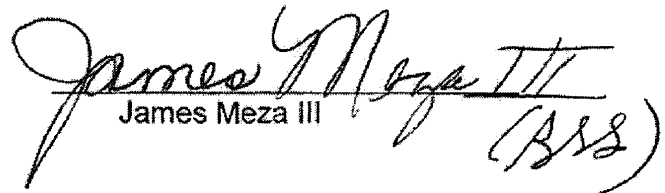
First Class U.S. Mail and Electronic Mail this 15th day of March, 2006 to the following:

Patrick K. Wiggins
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-
pwiggins@psc.state.fl.us

National Telecom & Broadband
Services, LLC
Mark Mansour
2626 E. Oakland Boulevard, Suite 400
Ft. Lauderdale, FL 33306
Tel. No. (954) 616-5612
Fax No. (954) 771-7608
mmansour@national-tel.com

Beth Salak
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Vicki Gordon Kaufman
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White & Krasker, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
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vkaufman@moylslaw.com
Represents National Telecom


James Meza III (BSS)

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of National Telecom & Broadband)	
Services, LLC against)	
BellSouth Telecommunications, Inc. for)	Docket No.: 060068-TP
Breach of Interconnection Agreement and)	
Petition for Emergency Order Restoring Service)	Filed: March 15, 2006
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S SECOND UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this Second Unopposed Motion for Extension of Time to File Responsive Pleadings to the Complaint of National Telecom & Broadband Services, LLC ("National Telecom") for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service (hereinafter the "Complaint"), and says:

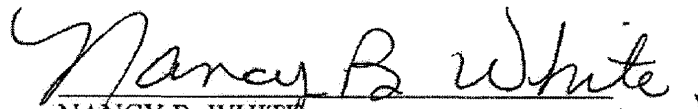
1. On January 26, 2006, National Telecom filed its Complaint against BellSouth.
2. BellSouth filed an Unopposed Motion for Extension of Time to File an Answer on February 14, 2006.
3. Pursuant to Order No. PSC-06-0162-PCO-TP, BellSouth was granted an extension until March 20, 2006 to file a response to the Complaint.
4. BellSouth now seeks an additional thirty (30) day extension of time, through and including April 19, 2006, in which to file responsive pleadings to the Complaint. Such an extension will give the parties additional time to perform an in-depth review of the disputed charges in the Complaint as well as to seek a negotiated resolution of the Complaint and other matters.


5. BellSouth makes this timely request in good faith and no party will be prejudiced by granting this Motion. National Telecom has no objection to the requested relief.

WHEREFORE, BellSouth respectfully requests a thirty (30) day extension of time, through and including April 19, 2006, to file responsive pleadings to the Complaint.

Respectfully submitted this 15th day of March, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.


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


R. DOUGLAS LACKEY (BSI)
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(404) 335-0769