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 II

Enclosures

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

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) 413pwiggins@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 Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Tel. No. (850) 413-6600

Vicki Gordon Kaufman
Moyle Flanigan Katz Raymond
White & Krasker, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@moylelaw.com
Represents National Telecom

James Meza III

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
)	

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. WHIT

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. DOUGLAS LACKEY

JAMES MEZA III

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0769