Dorothy Menasco

ORIGINAL

F	ro	m	1:

Fatool, Vicki [Vicki.Fatool@BellSouth.COM]

Sent:

Thursday, May 18, 2006 3:53 PM

To:

Filings@psc.state.fl.us

Subject:

060068-TP BellSouth's Fourth Unopposed Motion for Extension of Time

Importance: High

Attachments: 060068-T.pdf

A. Vickie Fatool

> Legal Secretary to Manuel A. Gurdian BellSouth Telecommunications, Inc. 150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5560

Vicki.fatool@bellsouth.com

- Docket No.: 060068-TP Complaint of National Telecom & Broadband Services, LLC against BellSouth Telecommunications, В. Inc. for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service
- C. BellSouth Telecommunications, Inc. on behalf of Manuel A. Gurdian
- 4 pages total (includes letter, certificate of service and pleading) D.
- E. BellSouth Telecommunications, Inc.'s Fourth Unopposed Motion for Extension of Time

.pdf

<<060068-T.pdf>>

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DOCUMENT NUMBER-DATE

04384 MAY 188

Manuel A. Gurdian Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

May 18, 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 Fourth 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 upon all parties of record.

Sincerely,

Manuel A. Gurdian

Enclosures

cc: All parties of record Jerry D. Hendrix James Meza III E. Earl Edenfield, Jr.

> DOCUMENT NO. 04384-06 5-18-06

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 18th day of May, 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) 413-6212
pwiggins@psc.state.fl.us

Beth Salak
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6600
bsalak@psc.state.fl.us

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

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

Januel A, Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of National Telecom & Broadband)	Docket No. 060068-TP
Services, LLC against)	
BellSouth Telecommunications, Inc. for)	
Breach of Interconnection Agreement and)	
Petition for Emergency Order Restoring Service		
	ý	Filed: May 18, 2006

BELLSOUTH TELECOMMUNICATIONS, INC.'S FOURTH UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this Fourth 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. On March 15, 2006, BellSouth filed a Second Unopposed Extension of Time to File Responsive Pleading asking for an extension of time through and including April 19, 2006.
- 5. On April 19, 2006, BellSouth filed a Third Unopposed Extension of Time to File Responsive Pleading asking for an extension of time through and including May 19, 2006.

6. BellSouth now seeks an additional seven (7) day extension of time, through and including May 26, 2006, in which to file responsive pleadings to the Complaint.

7. The parties have engaged in extensive negotiations and have been able to reach a settlement. However, additional time is required for the parties to formulate and execute a settlement agreement that will resolve the matter in its entirety.

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

WHEREFORE, BellSouth respectfully requests a seven (7) day extension of time, through and including May 26, 2006, to file responsive pleadings to the Complaint.

Respectfully submitted this 18th day of May, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

JAMES MEZA III

MANUEL A GURDIAN

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

. EARL EDENFIELD. JR.

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0763