

Matilda Sanders

ORIGINAL

From: Fatool, Vicki [Vicki.Fatool@BellSouth.COM]  
 Sent: Friday, June 02, 2006 1:43 PM  
 To: Filings@psc.state.fl.us  
 Subject: 060068-TP BellSouth's Sixth 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](mailto:Vicki.fatool@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 Manuel A. Gurdian
- D. 5 pages total (includes letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc.'s Sixth Unopposed Motion for Extension of Time

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<<060068-T.pdf>>

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Manuel A. Gurdian  
Attorney

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

June 2, 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 Sixth 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.

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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 2nd day of June, 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](mailto:pwiggins@psc.state.fl.us)

Nancy Pruitt  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6600  
[npruitt@psc.state.fl.us](mailto:npruitt@psc.state.fl.us)

Vicki Gordon Kaufman  
Moyle Flanigan Katz Raymond  
White & Krasker, P.A.  
118 North Gadsden Street  
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Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
[vkaufman@moylelaw.com](mailto: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  
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\_\_\_\_\_  
Manuel A. Gurdian

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of National Telecom & Broadband Services, LLC against BellSouth Telecommunications, Inc. for Breach of Interconnection Agreement and Petition for Emergency Order Restoring Service ) ) ) ) ) ) )

Docket No. 060068-TP

Filed: June 2, 2006

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

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this Sixth 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 Motion for 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 Motion for Extension of Time to File Responsive Pleading asking for an extension of time through and including May 19, 2006.

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6. On May 18, 2006, BellSouth filed a Fourth Unopposed Motion for Extension of Time to File Responsive Pleading asking for an extension of time through and including May 26, 2006.

7. On May 25, 2006, BellSouth filed a Fifth Unopposed Motion for Extension of Time to File Responsive Pleading asking for an extension of time through and including June 2, 2006.

8. BellSouth now seeks an additional seven (7) day extension of time, through and including June 9, 2006, in which to file responsive pleadings to the Complaint.


9. The parties have reached a settlement and negotiated the terms of a settlement agreement. At this time, BellSouth awaits National Telecom's execution of the settlement agreement.

10. 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 June 9, 2006, to file responsive pleadings to the Complaint.

Respectfully submitted this 2nd day of June, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



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JAMES MEZA III  
MANUELA GURDIAN  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
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(305) 347-5558

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