

Matilda Sanders

From: terry.scobie@verizon.com
Sent: Monday, July 24, 2006 2:55 PM
To: Filings@psc.state.fl.us
Cc: de.oroark@verizon.com; David Christian; frank.app@verizon.com; demetria.c.watts@verizon.com
Subject: Docket No. 020960-TP - Verizon Florida/Covad Joint Motion for Extension of Time
Attachments: 020960-VZ FL-Covad Joint Motion for Extension 7-24-06.pdf



020960-VZ
Covad Joint Moti

The attached filing is submitted in Docket No. 020960-TP on behalf of Verizon Florida Inc. and Covad Communications Company by

Dulaney L. O'Roark III
Six Concourse Parkway
Suite 600
Atlanta, Georgia 30328
(770) 284-5498
de.oroark@verizon.com

The attached .pdf document contains 5 pages - transmittal letter (1 page), certificate of service (1 page), and Joint Motion for Extension of Time (3 pages).

(See attached file: 020960-VZ FL-Covad Joint Motion for Extension 7-24-06.pdf)

Terry Scobie
Executive Adm. Assistant
Verizon Legal Department
813-483-2610 (tel)
813-204-8870 (fax)
terry.scobie@verizon.com

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Dulaney L. O'Roark III
Vice President & General Counsel, Southeast Region
Legal Department

Six Concourse Parkway
Suite 600
Atlanta, Georgia 30328

Phone 770-284-5498
Fax 770-284-5488
de.oroark@verizon.com

July 24, 2006 – VIA ELECTRONIC MAIL

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

Re: Docket No. 020960-TP
Petition for Arbitration of open issues resulting from interconnection negotiations
with Verizon Florida Inc. by DIECA Communications, Inc. d/b/a Covad
Communications Company

Dear Ms. Bayo:

Enclosed for filing in the above-matter is a Joint Motion for Extension of Time on behalf
of Verizon Florida Inc. and DIECA Communications, Inc. d/b/a Covad Communications
Company. Service has been made as indicated on the Certificate of Service. If there
are any questions regarding this filing, please contact me at 770-284-5498.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Joint Motion for Extension of Time in Docket No. 020960-TP were sent via U.S. mail on July 24, 2006 to

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Anthony Hansel
Covad Communications Company
600 14th Street, NE, Suite 750
Washington, DC 20005

Charles E. Watkins
Covad Communications Company
1230 Peachtree Street, NE, Suite 1900
Atlanta, GA 30309-3578

Aaron Panner/Scott Angstreich
Kellogg Huber Law Firm
1615 M Street, NW, Suite 400
Washington, DC 20036

Vicki Gordon Kaufman
Moyle Flanigan Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

s/Dulaney L. O'Roark III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of open issues)	Docket No. 020960-TP
resulting from interconnection negotiations)	Filed: July 24, 2006
with Verizon Florida Inc. by DIECA)	
Communications, Inc. d/b/a Covad)	
Communications Company)	
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JOINT MOTION FOR EXTENSION OF TIME

Verizon Florida Inc. (Verizon) and DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) hereby jointly move this Commission for an extension of time to file an interconnection agreement in this arbitration proceeding until November 3, 2006.

With respect to the vast majority of the Commission's determinations in this docket, Verizon and Covad were able to draft agreed-upon language consistent with the Commission's final order on arbitration (PSC-03-1139-FOF-TP) issued October 13, 2003. Nonetheless, the parties were not able to reach agreement on how to address the changes from the FCC's Triennial Review Order (TRO) in the interconnection agreement. Accordingly, in Order No. PSC-06-0135-PCO-TP, the Commission extended the time for filing a signed conforming amendment to 90 days following the issuance of its order approving the agreement amendments in Docket No. 040156-TP. Since then, on March 15, 2006, the Commission issued Order No. PSC-06-0212-FOF-TP in Docket No. 040156-TP specifying language to be used in the parties' amendments; on March 17, Verizon filed an executed amendment with Covad pursuant to the March 15 Order; and on May 4, Staff administratively approved that amendment.

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To allow the parties sufficient time to review both the previously agreed-upon language and to incorporate the rulings of the Commission in Docket No. 040156-TP into their conforming agreement, Verizon and Covad requested that the Commission extend the time for filing a conforming agreement to August 2, 2006 which was granted in Order No. PSC-06-0528-PCO-TP issued June 22, 2006.

Finalizing contract language has been a more comprehensive effort than anticipated given the age and updates proposed to the non-TRO related draft contract language previously worked on by the parties coupled with efforts to incorporate the rulings of the Commission in Docket No. 040156-TP. Therefore, Verizon and Covad respectfully request that the Commission extend the time for filing a conforming agreement until November 3, 2006.

Because both parties join in this request, no party will be prejudiced by this extension.

WHEREFORE, for the foregoing reasons, Verizon and Covad respectfully request that this Commission extend the time for filing an executed, conforming amendment to November 3, 2006.

Respectfully submitted on July 24, 2006.

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III
Verizon Legal Department
6 Concourse Parkway, Suite 600
Atlanta, Georgia 30328
Phone: (770) 284-5498
Fax: (770) 284-5488
Email: de.oroark@verizon.com

Attorney for Verizon Florida Inc.

and

Charles E. Watkins
Covad Communications Company
1230 Peachtree Street, N.E., Suite 1900
Atlanta, GA 30309
Telephone: 678-528-6816

Vicki Gordon Kaufman
Moyle, Flanigan, Katz, Raymond & Sheehan, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
Telephone: 850-681-3828

Attorneys for DIECA Communications, Inc. d/b/a
Covad Communications Company