

# ORIGINAL

**Timolyn Henry**

**From:** Smith, Debbie N. [Debbie.N.Smith@BellSouth.COM]  
**Sent:** Thursday, October 12, 2006 1:06 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Carver, J; Fatool, Vicki; Slaughter, Brenda ; Nancy Sims; Holland, Robyn P; Randa, Johna A  
**Subject:** Florida Docket No. 060366-TP  
**Importance:** High  
**Attachments:** jointmotionforstay.pdf

A. Debbie N. Smith  
 Legal Secretary to J. Phillip Carver  
 BellSouth Telecommunications, Inc.  
 150 South Monroe Street  
 Suite 400  
 Tallahassee, Florida 32301  
 (404) 335-0772  
[debbie.n.smith@bellsouth.com](mailto:debbie.n.smith@bellsouth.com)

B. Docket No. 060366-TP: Complaint regarding BellSouth Telecommunications, Inc.'s failure to offer its promotional tariff offerings for resale and request for relief, by Supra Telecommunications and Information Systems, Inc.

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR ~~C.~~ BellSouth Telecommunications, Inc.

ECR \_\_\_\_\_ on behalf of J. Phillip Carver

GCL ~~D.~~ 4 pages total (including letter, certificate of service and pleading)

OPC \_\_\_\_\_  
RCA E. Joint Motion for Stay

SCR \_\_\_\_\_  
SGA <<jointmotionforstay.pdf>>

SEC | \*\*\*\*\*

OTH Kim P.  
 The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers.  
 GA623

DOCUMENT NUMBER-DATE

09483 OCT 12 06

FPSC-COMMISSION CLERK

ORIGINAL

Legal Department

J. Phillip Carver  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

October 12, 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. 060366-TP**  
**In Re: Complaint regarding BellSouth Telecommunications, Inc.'s  
failure to offer its promotional tariff offerings for resale and request  
for relief, by Supra Telecommunications and Information Systems,  
Inc.**

Dear Ms. Bayó:

Enclosed is the Joint Motion for Stay, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
J. Phillip Carver

Enclosure

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

DOCUMENT NUMBER-DATE

09483 OCT 12 06

FPSC-COMMISSION CLERK

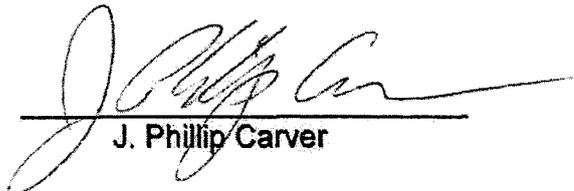
**CERTIFICATE OF SERVICE  
DOCKET NO. 060366-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 12th day of October, 2006 to the following:

Kira Scott  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6216  
[kscott@psc.state.fl.us](mailto:kscott@psc.state.fl.us)

Marva Brown Johnson  
General Counsel  
Supra Telecommunications  
and Information Systems, Inc.  
1000 Legion Place  
Gateway Center  
Suite 1650  
Orlando, FL 32801  
Tel. No. (407) 447-9482  
Fax. No. (407) 447-1965  
[marva.johnson@supratelecom.com](mailto:marva.johnson@supratelecom.com)

Beth Keating, Esq.  
Akerman Senterfitt  
106 East College Avenue  
Suite 1200  
P.O. Box 1877 (32302)  
Tallahassee, FL 32301  
Tel. No. (850) 521-8002  
Fax No. (850) 222-0103  
[beth.keating@akerman.com](mailto:beth.keating@akerman.com)

  
\_\_\_\_\_  
J. Phillip Carver

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint regarding BellSouth Telecommunications, Inc.'s ) Docket No.: 060366-TP  
failure to offer its promotional tariff offerings for resale )  
and request for relief, by Supra Telecommunications and )  
Information Systems, Inc. )  
\_\_\_\_\_ ) Filed: October 12, 2006

**JOINT MOTION FOR STAY**

BellSouth Telecommunications, Inc. ("BellSouth") and Supra Telecommunications and Information Systems, Inc. ("Supra"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby request that the Florida Public Service Commission ("Commission") grant a stay of the proceedings in the above-styled matter for a period of 30 days. In support of this motion, BellSouth and Supra state the following:

1. Pursuant to the Order Establishing Procedure, issued on August 31, 2006, (Order No. PSC-06-0738-PCO-TP), and the Order Granting Joint Motion For Extension of Time to File Direct Testimony issued on September 25, 2006 (Order No. PSC-06-0799-PCO-TP), Direct Testimony is due on October 13, 2006, and Rebuttal Testimony is due on November 1, 2006.

2. BellSouth and Supra jointly request that all proceedings in this docket, including the testimony filing deadlines referenced above be stayed for a period of 30 days from the date of issuance of the Order granting this motion.

3. The parties are currently involved in settlement negotiations and are optimistic that the matters at issue in this proceeding can be amicably resolved. Any resolution, however, can likely not be finalized before the deadline for filing direct testimony, i.e., October 13, 2006. For this reason, the parties request a stay of 30 days,

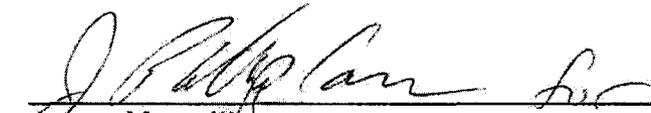
which should be adequate for them to determine if this matter can be amicably resolved and, if so, to finalize such resolution.

4. Neither the parties nor Staff would be prejudiced by granting this motion. Counsel for Supra has authorized the undersigned counsel for BellSouth to submit this Joint Motion on behalf of Supra as well as BellSouth.

**WHEREFORE**, for the foregoing reasons, BellSouth and Supra respectfully request that the Commission grant the parties a stay.

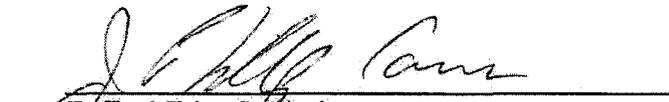
Respectfully submitted this 12th day of October, 2006.

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



---

E. Earl Edenfield, Jr.  
J. Phillip Carver  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0710