

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

October 30, 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

tas

Enclosures

## **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 October 30, 2006 to

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

Anthony Hansel  
Covad Communications Company  
600 14<sup>th</sup> 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: October 30, 2006
with Verizon Florida Inc. by DIECA	)	
Communications, Inc. d/b/a Covad	)	
Communications Company	)	
_____	)	

**JOINT MOTION FOR EXTENSION OF TIME**

Verizon Florida Inc. (Verizon) and DIECA Communications, Inc. d/b/a Covad Communications Company (Covad) hereby jointly move that the Commission extend the time to file an interconnection agreement in this arbitration proceeding until March 2, 2007.

Finalizing contract language has been a more comprehensive effort than expected because the parties have had to review previously agreed-upon language, incorporate language stemming from the Final Order on Arbitration, Order No. PSC-03-1139-FOF-TP issued on October 13, 2003, and incorporate TRO/TRRO related changes along with rulings on disputed TRO/TRRO amendment language issued in the Order on Arbitration in Docket No. 040156-TP, Order No. PSC-06-0212-FOF-TP, released March 15, 2006. The parties have made significant progress in agreeing upon a new interconnection agreement and have expended a great deal of time and effort in the following areas:

- Existing contract - A thorough review of previously agreed-upon contract language has been undertaken to ensure it conforms to current business practices. That review has generated numerous agreed-upon changes.
- Order on Arbitration – The parties have been reviewing and incorporating language that conforms to interconnection arbitration Order No. PSC-03-1139-FOF-TP issued on October 13, 2003.
- TRO/TRRO amendment language – The parties are incorporating TRO/TRRO related changes along with language to incorporate disputed language issues resolved in the Order on Arbitration in Docket No. 040156-TP, Order No. PSC-06-0212-FOF-TP.

Given the complexity of this effort and the willingness of both parties to continue to work toward an agreed-upon conforming agreement, Verizon and Covad respectfully request that the Commission extend the time for filing their agreement until March 2, 2007. 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 the Commission extend the time for filing an executed, conforming amendment to March 2, 2007.

Respectfully submitted on October 30, 2006.

s/ Dulaney L. O'Roark III  
Dulaney L. O'Roark III  
Six Concourse Parkway, Suite 600  
Atlanta, Georgia 30328  
Phone: (770) 284-5498  
Fax: (770) 284-5488  
Email: [de.oroark@verizon.com](mailto:de.oroark@verizon.com)

Attorney for Verizon Florida Inc.

s/ Charles E. Watkins  
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 White & Krasker, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
Telephone: 850-681-3828

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