### Diamond Williams

100340-TP

From:

WOODS, VICKIE (Legal) [vf1979@att.com]

Sent:

Thursday, August 26, 2010 4:00 PM

To:

Filings@psc.state.fl.us

Subject:

Docket No. 100340-TP (ATMS) AT&T Florida's Motion for Extension of Time to Subpoena

**Duces Tecum without Deposition** 

Attachments: Document.pdf

A. Vickie Woods

BellSouth Telecommunications, Inc. d/b/a AT&T Florida

150 South Monroe Street

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Tallahassee, Florida 32301

(305) 347-5560

#### vf1979@att.com

B. <u>Docket No.: 100340-TP</u> Investigation of Associated Telecommunications Management

Services, LLC (ATMS) companies for compliance with Chapter 25-24, F.A.C., and

applicable lifeline, eligible telecommunication carrier, and universal service requirements

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida

on behalf of Manuel A. Gurdian

- D. 4 pages total (includes letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion for Extension of Time to Respond to Subpoena

**Duces Tecum without Deposition** 

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AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, FL 32301

T: (305) 347-5561 F: (305) 577-4491 manuel.gurdian@att.com

August 26, 2010

Ms. Ann Cole Commission Clerk Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No.: 100340-TP Investigation of Associated

Telecommunications Management Services, LLC (ATMS) companies for compliance with Chapter 25-24, F.A.C., and applicable lifeline, eligible telecommunication carrier, and

universal service requirements

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Motion for Extension of Time to respond to Staff's Subpoena Duces Tecum, dated June 30, 2010 in the captioned matter.

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

Sincerely,

Manuel A Gurdian

cc: Parties of Record Jerry D. Hendrix Gregory R. Follensbee E. Earl Edenfield, Jr. Adam Teitzman Vicki Kaufman

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## Certificate of Service Docket No. 100340-TP

I HEREBY CERTIFY that a true and correct copy was served via (\*) Electronic

Mail and First Class U.S. Mail this 26<sup>th</sup> day of August, 2010 to the following:

Florida Public Service Commission Adam Teitzman, General Counsel (\*) Charles Murphy, Staff Counsel (\*) 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 ateitzma@psc.state.fl.us cmurphy@psc.state.fl.us

Keefe Law Firm Vicki Gordon Kaufman (\*) 118 North Gadsden Street Tallahassee, FL 32301 Tel. No. (850) 681-3828 Fax. No. (850) 681-8788 vkaufman@kagmlaw.com

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American Dial Tone, Inc.
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Manuel A. Gurdian

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of Associated Telecommunications	)	Docket No. 100340-TP
Management Services, LLC (ATMS) companies for	)	
compliance with Chapter 25-24, F.A.C., and applicable	)	
lifeline, eligible telecommunications carrier, and universal	)	
service requirements	)	
	)	Filed: August 26, 2010

# MOTION FOR EXTENSION OF TIME TO RESPOND TO SUBPOENA DUCES TECUM WITHOUT DEPOSITION

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby files this Motion for Extension of Time to Respond to the Subpoena Duces Tecum Without Deposition ("Subpoena") dated June 30, 2010 in the captioned docket. As grounds therefor, AT&T Florida state as follows:

- On June 30, Staff issued a Subpoena Duces Tecum Without Deposition to AT&T Florida.
- 2. On July 12, 2009, Associated Telecommunications Management Services ("ATMS") filed an Objection to Non-Party Subpoenas and Motion to Quash.
  - 3. On July 29, 2010, Staff filed a response to ATMS' Objection and Motion.
- 4. On August 6, the Florida Public Service Commission ("FPSC") issued Order No. PSC-10-0491-PCO-TP ("Order") denying the motion to quash non-party subpoenas and requiring all Florida-specific information to be provided within 20 days of the Order. Thus, AT&T Florida's response to the Subpoena is due on August 26, 2010.
- 5. AT&T Florida will be providing confidential responses under a claim of confidentiality to all of the items requested by staff in its Subpoena, except one, today.

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6. In order to properly respond to item No. 1(f), AT&T Florida requires additional time. Accordingly, AT&T Florida respectfully requests an extension of time of fourteen (14) days to respond to item No. 1(f) of the Subpoena.

WHEREFORE, for the foregoing reasons, AT&T Florida requests that the Prehearing Officer grant this motion extending the due date of AT&T Florida's response to the Subpoena to September 9, 2010.

Respectfully submitted this 26th day of August, 2010.

AT&T FLORIDA

E. EARL EDENFIELD JR.

TRACY W. HATCH

MANUEL A. GURDIAN

c/o Gregory R. Follensbee

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