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Sent: Friday, October 22, 2010 12:12 PM
To: Filings@psc.state.fl.us
Subject: 100176/100177-TL AT&T Florida and Sprint's Joint Motion to Stay Proceedings
Attachments: Document.pdf

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B. Docket No. 100176-TP: Petition for Arbitration of Interconnection Agreement between

BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications
 Company L.P.

Docket No. 100177-TP: Petition for Arbitration of Interconnection Agreement between

BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Spectrum L.P., Nextel

South Corp., and NPCR, Inc. d/b/a Nextel Partners

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

on behalf of Manuel A. Gurdian

D. 6 pages total (includes letter, pleading and certificate of service)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications Company L.P.,
Sprint Spectrum,

L.P. d/b/a Sprint PCS, Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners' Joint Motion to Stay
 Proceedings

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Certificate of Service
Docket Nos. 100176-TP and 100177-TP

I HEREBY CERTIFY that a true and correct copy was served via Electronic Mail and First Class U. S. Mail this 22nd day of October, 2010 to the following:

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Manuela A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)
Petition for Arbitration of)
Interconnection Agreement Between) Docket No. 100176-TP
BellSouth Telecommunications, Inc.)
d/b/a AT&T Florida and Sprint)
Communications Company L.P.)

In re:)
Petition for Arbitration of)
Interconnection Agreement Between) Docket No. 100177-TP
BellSouth Telecommunications, Inc.)
d/b/a AT&T Florida)
and Sprint Spectrum L.P., Nextel South)
Corp., and NPCR, Inc. d/b/a Nextel Partners)
_____) Filed: October 22, 2010

JOINT MOTION TO STAY PROCEEDINGS

BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida”) and Sprint Communications Company Limited Partnership, Sprint Spectrum L.P. d/b/a Sprint PCS, Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners (collectively “Sprint entities”)(together, the “Parties”) file this Joint Motion to Stay Proceedings in these dockets.

1. On April 9, 2010, AT&T Florida filed its Petitions for Arbitration of Interconnection Agreements with the Sprint entities at the Florida Public Service Commission (“Commission”).

2. On August 2, 2010, the Commission issued its Order Establishing Procedure, Order No. PSC-10-0481-PCO-TP (“Order”), which established an administrative hearing in these dockets on December 1-3, and 6, 2010. In addition to providing hearing dates, the Order provided certain dates for the filing of testimony, prehearing statements, discovery requests, etc.

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3. Due to the extended illness of an AT&T witness, and the desire of the parties to engage in settlement discussions to attempt in good faith to resolve or narrow some or all of the issues in these dockets, AT&T Florida and the Sprint entities jointly request a suspension of the current procedural schedule, as set forth in the Commission's August 2nd Order Establishing Procedure, and agree to and respectfully request the following:

- A. The Commission will issue an order staying the pending Petitions for Arbitration and associated procedural schedule until January 11, 2011 (the "Stay"). This Stay includes, but is not limited to, the stay of deadlines for pending discovery (including Staff's 2nd Set of Interrogatories and Requests for Production of Documents, and 1st Request for Admissions) and the pre-hearing statements, as well as the dates for the pre-hearing conference, the discovery deadline and hearing dates established in the August 2nd Order Establishing Procedure.
- B. AT&T Florida and the Sprint entities will engage in good faith discussions and determine an agreed upon revised schedule for the resolution upon the completion of the Stay of any remaining issues in these dockets. AT&T Florida and the Sprint entities will advise Staff of their proposed schedule (including new hearing dates) for the dockets on or before November 5, 2010. In the event that the parties are unable to agree on a proposed schedule, either party may petition the Commission to lift the Stay after November 19, 2010.

- C. On January 25, 2011, the Parties will file responses to Staff's 2nd Set of Interrogatories and Requests for Production of Documents, to the extent any request is relevant to issues that remain in dispute upon the completion of the Stay.
- D. The Parties understand Staff intends to issue a 3rd set of discovery requests in the near future. Following the completion of the Stay, the Parties and Staff will establish a date for responding to those requests in that 3rd Set that are relevant to issues that remain in dispute.
- E. Thirty (30) days after issuance of the Commission order commencing the Stay, and every 30 days thereafter, the Parties will file a joint status report with the Commission identifying any issues that have been resolved and notifying the Commission of any new or revised issues.

4. Accordingly, based upon the foregoing, AT&T Florida and the Sprint entities request that the Commission enter an Order staying further proceedings regarding the pending Petitions for Arbitration until January 11, 2011.

5. The granting of this Joint Motion will allow the Commission to conserve its valuable resources and will not prejudice any party.

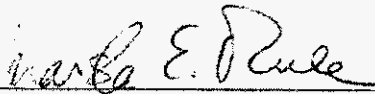
WHEREFORE, AT&T Florida and Sprint Communications Company Limited Partnership, Sprint Spectrum L.P. d/b/a Sprint PCS, Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners, respectfully request that the Commission enter an Order granting their Joint Motion to Stay Proceedings.

Respectfully submitted this 22nd day of October, 2010.



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