J. Phillip Carver General Attorney

1445 CT 14

Southern Bell Telephone and Telegraph Company c/o Marshall M. Criser III Suite 400 150 So. Monroe Street Tallahassee, Florida 32301 Phone (305) 530-5558

May 6, 1993

Mr. Steve C. Tribble Director, Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32301

Re: Docket No. 921193-TL - Palm Beach County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Second Motion for Extension of Time to file traffic study, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.ACK

Enclosures	APP f. Phi	ely yours, Ilip CanWI (2) Ilip Carver
cc: All Parties of A. M. Lombardo Harris R. Anth R. Douglas Lac	ony LEG I w/m	
RECEIVED & FILED	A BELLSOUTH Company	DOCUMENT NUMBER-DATE 05003 HAY-68 VPSC-RECORDS/REPORTING

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## CERTIFICATE OF SERVICE Docket No. 921193-TL

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I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this U day of May , 1993 to:

Staff Counsel Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863

Alan N. Berg Senior Attorney United Telephone Co. of Florida Post Office Box 5000 Altamonte Spgs, FL 32715-5000

Michael W. Tye AT&T Communications of the Southern States, Inc. 106 East College Avenue Suite 1410 Tallahassee, Florida 32301

Phillip Carner

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Request by Palm Beach County Board of County Commissioners for Extended Area Service Between all Exchanges in Palm Beach County

1.1

Docket No. 921193-TL

Filed:

## SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S SECOND MOTION FOR EXTENSION OF TIME

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.037, Florida Administrative Code, and hereby moves the Florida Public Service Commission ("Commission") for a second thirty-day extension of time in which to file a traffic study in response to Order No. PSC-93-0029-PCO-TL, entered in the above-referenced docket, and states as grounds in support thereof the following:

1. On January 6, 1993, this Commission issued Order No. PSC-93-0029-PCO-TL, which directed Southern Bell to prepare and submit within 90 days a traffic study of the routes between all exchanges in Palm Beach County. Thus, under the Order, the required traffic study was due on or before April 6, 1993. Prior to the expiration of the time for filing the study, Southern Bell requested a thirty-day extension of time. The reason for this request was that the unusual complexity of the required study was such that it could likely not have been completed by April 6, 1993. Accordingly, a thirty-day extension was requested, until May 6, 1993.

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2. Within the past thirty days, Southern Bell completed the study as directed. The results of the study, however, are such that it appears that the study is not valid. In other words, the data that the study produced appears on its face to be inaccurate.

3. Accordingly, Southern Bell requires additional time to determine the cause of the problem that resulted in these apparently invalid results, to correct the problem, and to conduct a new study that will yield accurate information. Southern Bell believes that an additional period of thirty days will be adequate for it to accomplish these tasks.

4. The requested additional extension will not prejudice any party to this proceeding. Further, it will allow Southern Bell adequate time to provide this Commission with the information necessary to reach an informed decision in this matter.

WHEREFORE, Southern Bell Telephone and Telegraph Company respectfully requests that this Commission grant it a second

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thirty-day extension, until June 5, 1993, in which to respond to Order No. PSC-93-0029-PCO-TL.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

General Counsel-Florida c/o Marshall M. Criser III 150 So. Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 530-5555

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