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Legal Department

NANCY B. WHITE  
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May 9, 1996

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

RE: Docket No. 950984-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Joint Motion to Extend Response Time. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
Nancy B. White (22)

ACK

AEA \_\_\_\_\_

AEP \_\_\_\_\_

CAF  Enclosures

CMU

cc: All Parties of Record

CTR \_\_\_\_\_ A. M. Lombardo

EAG \_\_\_\_\_ R. G. Beatty

LEG 1 \_\_\_\_\_ R. D. Lackey

LIN 5 \_\_\_\_\_

OPC \_\_\_\_\_

RCH \_\_\_\_\_

SEC 1 \_\_\_\_\_

WAS \_\_\_\_\_

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*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05245 MAY-96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) )  
to establish nondiscriminatory )  
rates, terms, and conditions for )  
resale involving local exchange ) Docket No. 950984-TP  
companies and alternative local )  
exchange companies pursuant to )  
Section 364.161, Florida Statutes ) Filed: May 9, 1996  
\_\_\_\_\_ )

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
JOINT MOTION TO EXTEND RESPONSE TIME

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and Metropolitan Fiber Systems of Florida, Inc. ("MFS") and pursuant to Rule 25-22.037, Florida Administrative Code, files a Joint Motion to Extend Response Time.

1. By Order No. PSC-96-0444-FOF-TP ("Order"), issued on March 29, 1996, the Florida Public Service Commission ("Commission") required BellSouth and MFS to instigate and complete certain tasks within 60 days of the issuance of the Order.

2. BellSouth and MFS have worked diligently to complete the obligations in good faith since the issuance of the Order. Two of these obligations, however, are unable to be completed within the 60 day time frame given by the Commission.

3. First, BellSouth and MFS are attempting to develop a comprehensive proposal for sub-loop unbundling for the Commission's review as required by the Order. While BellSouth and MFS have met on several occasions to discuss this issue, it appears that a resolution will not be available in the time frame required by the Order. BellSouth and MFS, therefore, request an additional 30 days or until June 28, 1996 in which to complete

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development of a mutually satisfactory plan for sub-loop unbundling.

4. Second, the Order requires BellSouth to file cost studies for certain loops and ports requested by MPS. BellSouth will have these studies completed within the time frame required by the Order, with the exception of the study for the four-wire analog port. BellSouth is working with MPS to complete this study. BellSouth, therefore, requests an additional 30 days or until June 28, 1996 in which to complete development of the cost study for the four wire analog port.

WHEREFORE, BellSouth and MPS respectfully request that the Commission extend the time in which BellSouth is to file the cost study for the four wire analog port and the proposal for sub-loop unbundling until June 28, 1996.

Respectfully submitted this 9th day of May, 1996.

**METROPOLITAN FIBER SYSTEMS  
OF FLORIDA, INC.**

  
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**BELLSOUTH TELECOMMUNICATIONS, INC.**

  
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**CERTIFICATE OF SERVICE**  
**Docket No. 950984-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Federal Express this 9th day of May, 1996 to:

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