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August 21, 1996

ACK ✓
Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. ~~960833~~-TP

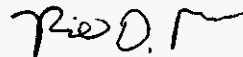
960833-TP

Dear Ms. Bayó:

Canzano
5 On behalf of MCI Telecommunications Corporation and MCImetro
Access Transmission Services, Inc. (MCI), I have enclosed for
filing in the above docket the original and 15 copies of MCI's
Motion for Two-Day Partial Extension of Time.

1 By copy of this letter this document has been provided to
the parties on the attached service list.

Very truly yours,



Richard D. Melson

RDM/cc
Enclosures
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI for)
arbitration of certain terms and) Docket No. 960846-TP
conditions of a proposed agreement with)
BellSouth Telecommunications, Inc.)
concerning interconnection and resale) Filed: August 21, 1996
under the Telecommunications Act of)
1996)
_____)

MCI'S MOTION FOR TWO-DAY
PARTIAL EXTENSION OF TIME

MCI Telecommunications Corporation and MCImetro Access
Transmission Services, Inc. (collectively, MCI) hereby move for a
two-day partial extension of time in which to submit the prefiled
direct testimony of four of their witnesses in this proceeding.
As grounds therefor, MCI states:

1. By Order No. PSC-96-1039-PCO-TP, the Prehearing Officer
granted MCI's and AT&T's joint motion to consolidate their
arbitration proceedings against BellSouth under Section 252 of
the Telecommunications Act of 1996. The requested consolidation
was granted on the following conditions:

(a) When MCI files its petition and proposed list of
issues, there must be a significant proportion of common issues
[with AT&T];

(b) To allow adequate time to prepare for hearing, MCI
shall file its petition, proposed list of issues and supporting
documentation by August 15, 1996;

(c) MCI shall file its prefiled direct testimony and
exhibits by August 21, 1996.

The order stated that if such conditions were not met, the Prehearing Officer would revisit the decision to consolidate.

2. MCI has met the first two conditions and has partially met the third condition. MCI's Petition was filed on August 15, 1996, and the accompanying issue list demonstrated a significant proportion of common issues with AT&T. Today, MCI is filing the direct testimony and exhibits of two witnesses. MCI has been unable to complete the preparation of the prefiled testimony and exhibits of its four remaining witnesses in time to meet the August 21st filing date.

3. MCI is currently engaged, or will be engaged, in arbitration proceedings with the Regional Bell Operating Companies in numerous states, and with the many of the major independent telephone companies in various states in which they operate. To support these arbitration proceedings, MCI assembled teams of witnesses, including in-house personnel and outside consultants, who were charged with preparing "White Papers" with respect to the major categories of issues to be arbitrated. The White Papers are designed to be included as exhibits to the testimony of their co-authors in state arbitration proceedings throughout the country.

4. In order to minimize confusion, and eliminate the need for filing supplemental testimony, the White Papers were designed to incorporate the effect of the FCC's Local Competition Order released on August 8, 1996. The completion of these White Papers was scheduled for August 23, 1996.

5. Upon receipt of the Commission's scheduling order, MCI made its best efforts to advance the scheduled completion of these White Papers in order to support the August 21, 1996 testimony filing date. While MCI succeeded in completing two of the White Papers ahead of schedule, it has been unable to complete the four remaining White Papers in time to file on the timetable set forth in the Commission's order. Those White Papers will be completed in time to support prefiled direct testimony which MCI will file on August 23, 1996.

6. MCI notes that the Prehearing Officer recently granted BellSouth's request in the companion AT&T arbitration docket to delay the filing of supplemental testimony addressing the effect of the FCC's Local Competition Order until this same date -- August 23 -- in order to give BellSouth and AT&T sufficient time to address the effect of the FCC Order.

7. In the circumstances, no party will be unduly prejudiced by allowing the two arbitration cases to remain consolidated even though the direct testimony of four of MCI's six witnesses is filed two days beyond the originally scheduled date.

WHEREFORE, MCI requests that the Commission allow it to prefile the testimony of four of its witnesses on August 23, 1996, and that it continue the consolidation of the AT&T and MCI arbitration proceedings.

RESPECTFULLY SUBMITTED this 21st day of August, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

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and

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ATTORNEYS FOR MCI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 21st day of August, 1996.

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