

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Sprint Communications Company Limited Partnership for Arbitration of Proposed Interconnection Agreement with BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996

Docket No. 961150-TP Filed: October 24, 1996

MOTION OF SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP FOR EXTENSION OF DATE FOR FILING REBUTTAL TESTIMONY

Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned counsel, moves for an extension to November 1, 1996, of the date for the filing of rebuttal testimony in the above-styled docket, and in support thereof states:

- This docket involves the arbitration of the rates, terms 1. and conditions of interconnection, resale and purchase of unbundled elements pursuant to the Telecommunications Act of 1996.
- The current date for the filing of rebuttal testimony in this docket is October 29, 1996.
- On the morning of October 21, 1996, the parties attended 3. a Staff Workshop for the identification of issues in this complex The preliminary issue list contains 25 issues. The docket. workshop was attended by three representatives of Sprint, two representatives of BellSouth, and as many as six members of Staff.
- APP During the said workshop, a discussion took place among CAF CMU Verball participants regarding the date for the filing of rebuttal CTR ----testimony in this docket. Each of the three Sprint representa-EAG tives, including the undersigned, understood the Staff to state LEG that the date for filing rebuttal testimony in this docket had been LIN = OPC extended to November 1, 1996, the same date as in the similar Sprint/GTEFL arbitration docket.

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- 5. Following the workshop, Sprint's representatives related the November 1 rebuttal filing date to its company employees working on preparation of the rebuttal testimony, including its likely rebuttal witnesses. Those Sprint employees then adjusted their work schedules and workload based upon the November 1, 1996, date. As the Commission is aware, there are arbitration proceedings being conducted in numerous states and, thus, company resources are under extreme time constraints.
- 6. Late this morning, October 24, 1996, Sprint has learned from Staff that there was a misunderstanding at the workshop and the original rebuttal testimony filing date of October 29, 1996, is still in place.
- 7. The undersigned counsel has discussed this matter with Ms. Nancy White, counsel for BellSouth, and she has authorized me to state that (1) the two BellSouth representatives at the workshop, including Ms. White, also understood Staff to state that the rebuttal testimony filing date had been extended to November 1, 1996, (2) that she had communicated the November 1 date to BellSouth's own witnesses and staff, who relied upon the extension, and (3) that BellSouth joins in Sprint's request for an extension of the filing date to November 1, 1996.
- 8. Although arising solely out of misunderstanding, Sprint and BellSouth will be unduly prejudiced if the rebuttal testimony is required to be filed on October 29, 1996. The prehearing conference is scheduled for November 25, and thus no delay or

prejudice will result in extending the filing date to November 1, 1996.

WHEREFORE, Sprint respectfully requests the Commission to enter its Order extending until November 1, 1996, the date for the filing of rebuttal testimony.

Respectfully submitted,

Everett Boyd, Jr.

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CERTIFICATE OF SERVICE

I HEREDY CERTIFY that a true copy of the foregoing has been furnished by facsimile transmission and hand delivery on this of October, 1996, to the following:

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