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March 5, 1997

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

RE: **Docket Nos. ~~960845~~-TP and 960846-TP**  
**AT&T and MCI Arbitrations**

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time to File Interconnection Agreement. 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.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Noted
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- LIN 5
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
R. G. Beatty  
W. J. Ellenberg

Sincerely,

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

DOCUMENT NUMBER-DATE

~~02415~~ MAR-56

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**DOCKET NOS. 960833-TP and 960846-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 5th day of March, 1997 to the following:

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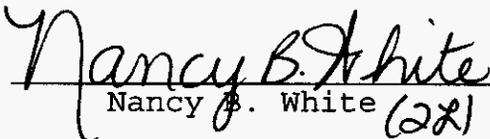
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Nancy B. White (2)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T )  
Communications of the Southern )  
States, Inc.; MCI Telecommunications )  
Corporation; MCI Metro Access )  
Transmission Services, Inc., for )  
arbitration of certain terms and )  
conditions of a proposed agreement )  
with BellSouth Telecommunications, )  
Inc., concerning interconnection and )  
resale under the Telecommunications )  
Act of 1996 )  
\_\_\_\_\_ )

Docket No. 960833-TP  
Docket No. 960846-TP

Filed: March 5, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'s MOTION FOR  
EXTENSION OF TIME TO FILE INTERCONNECTION AGREEMENT**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") pursuant to Rule 25-22.006, Florida Administrative Code, hereby files a Motion for Extension of Time. In support of the request, BellSouth states as follows:

1. By Order No. PSC-96-1579-FOF-TP (the Arbitration Order), issued December 31, 1996, BellSouth and MCI were directed to negotiate the final language of their respective proposed interconnection agreements reflecting the Commission's decisions in the Arbitration Order, and to file their proposed agreement within 30 days. On January 15, 1997, BellSouth filed a Motion for Reconsideration of the Arbitration Order.

2. As required by the Arbitration Order, on January 30, 1997, BellSouth and MCI filed a joint proposed interconnection agreement reflecting the provisions upon which each party agreed. The joint proposed agreement

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also reflected those instances where agreement could not be reached and set forth the proposed language of each party.

3. The Commission addressed the requests for reconsideration as well as the disputed contract provisions at its Special Agenda Conference held on February 21, 1997. With extensive discussion, the Commission voted to resolve the issues presented at the Special Agenda. At the conclusion of the Special Agenda Conference, the Staff suggested and the Commission determined that the final agreement between BellSouth and MCI incorporating the decisions made during the Special Agenda Conference should be filed by March 7, 1997. A written Order incorporating that requirement has not yet been issued.

4. Both BellSouth and MCI were present and observed the deliberations of the Commission at the Special Agenda Conference. The extensive discussion of the Commission has created confusion on the part of BellSouth as to the Commission's ultimate decisions and has engendered divergent views as to the decisions reached, as well as the supporting rationale. The differing views have made completing the final language of the arbitrated agreement impossible for BellSouth.

5. BellSouth believes that the Order to be issued reflecting the Commission's decisions should aid in achieving the appropriate language to be included in the final arbitrated agreement.

6. For the reasons discussed above, BellSouth requests that the Commission grant an extension of time to file the final arbitrated agreement until 14 days after the impending order is issued.

7. Undersigned Counsel for BellSouth sought MCI's concurrence in this Motion but MCI refused. BellSouth would note that BellSouth and AT&T filed a Joint Motion for Extension of Time and Sprint filed its own Motion for Extension of Time for the same reasons discussed above.

WHEREFORE, BellSouth respectfully urges the Commission to extend the filing deadline for filing the final interconnection agreement with MCI until 14 days after the Order resolving the requests for reconsideration and establishing the disputed portions of the joint proposed agreement is issued.

Respectfully submitted this 5th day of March, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty*

ROBERT G. BEATTY (22)

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c/o Nancy H. Sims

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