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September 15, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center
Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

Re: Docket No. 960786-TL

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc. ("TCG") are the original and fifteen copies of TCG's Motion for a Two-Day Extension of Time to File Late-Filed Exhibit No. 120.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

William B. Willingham

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cc: All Parties of Record

Trib. 3

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09385 SEP 15 97

FPSC-RECORDS/REPORTING

FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.

Docket No. 960786-TL

Filed: September 15, 1997

TELEPORT COMMUNICATIONS GROUP INC.'S MOTION FOR A TWO-DAY EXTENSION OF TIME TO FILE LATE-FILED EXHIBIT NO. 120

Teleport Communications Group Inc. ("TCG"), by and through its undersigned counsel, submits this Motion for a Two-Day Extension of Time to File Late-filed Exhibit No. 120 in the above-styled proceeding. In support of its Motion, TCG states as follows:

1. On the evening of September 10, 1997, the Commission Staff requested that TCG witness Mr. Frank Hoffmann provide late-filed Exhibit No. 120. Late-Filed Exhibit No. 120 requests documentation of each time that TCG informed BellSouth Telecommunications, Inc. that traffic volumes would change. Late-Filed Exhibit No. 120 also will contain an explanation of each increase in TCG's traffic. Later that evening, immediately prior to the conclusion of the hearing, Staff requested a due date of September 15, 1997 for all late-filed exhibits. Despite the concerns raised by TCG's attorney (Tr. 3531) and others, Chairman Johnson ruled that the late-filed exhibits must be filed on or before September 15, 1997, thereby providing less than three working days for TCG to gather and compile the documents and data that are responsive to Staff's request.

2. On Thursday, September 10, 1997, TCG's staff began to research its files for the documents, data and information responsive to Staff's request. As of this date, TCG has not been able to complete these tasks.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

3. TCG has worked, and will continue to work on an expedited basis, to complete compilation of information and documents which will comprise Late-filed Exhibit No. 120. However, TCG does expect to complete its response to Staff's request until September 17. Therefore, TCG requests a two-day extension of the deadline for filing late-filed exhibits. If TCG completes its response in time for service on September 16, the response will be served on that date.

WHEREFORE, for the foregoing reasons, TCG respectfully requests that its Motion for a Two-Day Extension of Time to File Late-filed Exhibit No. 120 be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 15th day of September, 1997:

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