

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Emergency Relief of Supra)
Telecommunications and Information)
Systems, Inc., Against BellSouth)
Telecommunications, Inc.)
_____)

Docket No. 980800-TP
Filed: September 21, 1998

RECORDS AND REPORTING

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SUPRA'S MOTION FOR LEAVE TO AMEND
PETITION FOR EMERGENCY RELIEF TO CONFORM TO THE ISSUES
IDENTIFIED AT THE ISSUE IDENTIFICATION MEETING IN THIS DOCKET

Supra Telecommunications and Information Systems, Inc. ("Supra"), by and through its undersigned counsel, hereby files this Motion for Leave to Amend Petition for Emergency Relief to Conform to the Issues Identified at the Issue Identification Meeting in this Docket, and as grounds therefor states:

- Supra 's initial filing of the Petition for Emergency Relief in this Docket on June 30, 1998, addressed the issues that had arisen as clearly being unsolvable between BellSouth Telecommunications, Inc. ("BellSouth") and Supra at that point in time.
- Subsequent to the filing of the Petition for Emergency Relief on June 30, 1998, it became apparent that BellSouth and Supra would not be able to resolve the conflict regarding the telecommunications equipment BellSouth would permit Supra to physically collocate in BellSouth central offices. BellSouth has taken the position that Supra is not legally entitled to physically collocate remote access concentrators in these two central offices. Therefore, at the Issue Identification Meeting in this Docket, held on August 26, 1998,

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10361 SEP 21 98

FPSC-RECORDS/REPORTING

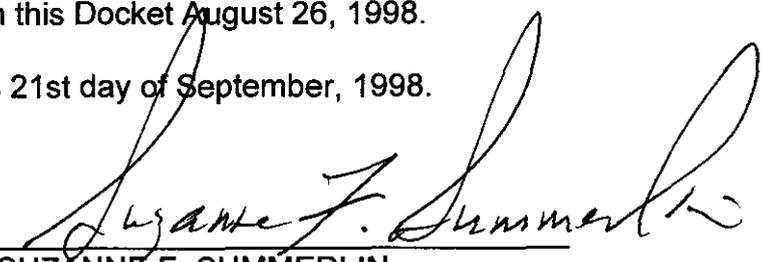
Supra identified the telecommunications equipment issue as part of the issues that needed to be addressed along with the other issues between Supra and BellSouth related to physical collocation in this proceeding.

3. Therefore, Supra requests that, by this motion, Supra be permitted to amend its petition for emergency relief to conform to the issues identified at the August 26, 1998, Issue Identification Meeting to include the following issue:

“Pursuant to the Collocation Agreement, what telecommunications equipment can and what telecommunications equipment cannot be physically collocated by Supra in BellSouth’s central offices?”

Wherefore, Supra respectfully requests the Commission to permit Supra Telecommunications and Information Systems, Inc., to amend its Petition for Emergency Relief to conform to the issues identified at the Issue Identification Meeting held in this Docket August 26, 1998.

Respectfully submitted, this 21st day of September, 1998.



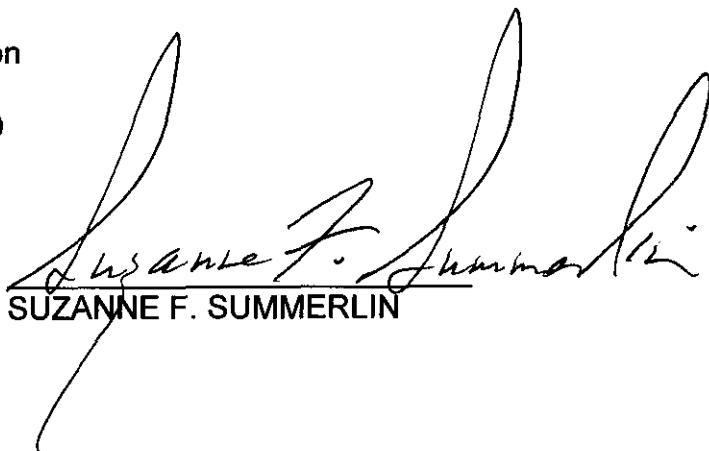
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SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.
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(850) 656-2288

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing
was furnished by hand delivery to the following individuals this 21st day of
September, 1998:

Nancy B. White, Esq.
c/o Ms. Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301

Beth Keating, Esq.
Division of Legal Services
Florida Public Service Commission
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