

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of WorldCom Technologies,)
Inc., against BellSouth Telecommunications,)
Inc., for breach of terms of Florida Partial)
Interconnection Agreement under Sections 251)
and 252 of the Telecommunications Act of 1996)
and request for relief.)

Docket No. 971478-TP

In re: Complaint of Teleport Communications)
Group Inc./TCG South Florida for Enforce-)
ment of Section IV.C of its Interconnection)
Agreement with BellSouth Telecommunications,)
Inc. and Request for Relief.)

Docket No. 980184-TP

In re: Complaint of Intermedia Communica-)
tions, Inc. against BellSouth Telecommunica-)
tions, Inc., for breach of terms of Florida)
Partial Interconnection Agreement under)
Sections 251 and 252 of the Telecommuni-)
cations Act of 1996 and request for relief.)

Docket No. 980495-TP

In re: Complaint of MCImetro Access Trans-)
mission Services, Inc., against BellSouth)
Telecommunications, Inc., for breach of terms)
of interconnection agreement under Section 252)
of the Telecommunications Act of 1996 and)
request for relief.)

Docket No. 980499-TP

Filed: October 21, 1998

COMPLAINANTS' JOINT MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR STAY PENDING APPEAL

WorldCom Technologies, Inc., Teleport Communications Group Inc./TCG South Florida, Intermedia Communications, Inc. and MCImetro Access Transmission Services, Inc. (hereinafter referred to collectively as "Complainants"), pursuant to Rule 28-106.204(5), Florida Administrative Code, hereby jointly move for a five day extension of time up to and until October 28, 1998, to file

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their Joint Response in Opposition to BellSouth Telecommunications, Inc.'s ("BellSouth") Motion for Stay Pending Appeal. In support of this request, Complainants state as follows:

1. On October 15, 1998, BellSouth filed a Motion for Stay Pending Appeal in this docket. BellSouth served the Motion for Stay Pending Appeal by overnight delivery on the respective counsel for Complainants. Pursuant to Rules 28-106.204(1) and 28-106.103, Florida Administrative Code, a response to BellSouth's Motion for Stay Pending Appeal is due October 23, 1998.¹

2. Rather than replicate similar arguments in four responses, the Complainants maintain that efficiencies would be served by the preparation of one joint response on behalf of all Complainants to BellSouth's Motion for Stay Pending Appeal. In order to do so, additional time is necessary for counsel for the four Complainants to coordinate schedules and confer in the preparation and filing of such a joint response. Accordingly, in anticipation of filing one joint response to BellSouth's Motion for Stay Pending Appeal, the Complainants request an extension of time of five days, *i.e.* up to and until October 28, 1998, to file a Joint Response in Opposition to BellSouth's Motion for Stay Pending Appeal.

3. The undersigned counsel has conferred with Nancy White, Esquire, counsel for BellSouth and is authorized to represent that BellSouth has no objection to the five day extension of time requested in this Motion.

¹Rule 28-106.103, Florida Administrative Code, provides that "[o]ne business day shall be added when service is made by overnight courier."

WHEREFORE, for the foregoing reasons, Complainants request that the Prehearing Officer enter an order granting Complainants an extension of time up to and until October 28, 1998, to file their Joint Response to BellSouth's Motion for Stay Pending Appeal.

Respectfully submitted,



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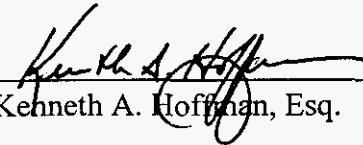
Counsel for MCImetro Access Transmission Services, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of was furnished by U. S. Mail to the following this
21st day of October, 1998:

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