

ORIGINAL

RECEIVED & FILED

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

99 JAN 19 PM 3:12

RECEIVED & FILED
RECORDS

In re: Petition by Intermedia Communications Inc.)
for Arbitration with BellSouth Telecommunications,)
Inc., Pursuant to the Telecommunications Act of 1996)

Docket No. 981642-TP

In re: Petition by e.spire Communications, Inc.)
And American Communication Services of Tampa,)
Inc., American Communications Services of)
Jacksonville, Inc. for Arbitration of an)
Interconnection Agreement with BellSouth)
Telecommunications, Inc. Pursuant to Section 252(b))
Of the Telecommunications Act of 1996)

Docket No. 981745-TP

JOINT MOTION TO AMEND
PROCEDURAL SCHEDULE

NOW COMES BellSouth Telecommunications, Inc. ("BellSouth"), Intermedia Communications, Inc. ("Intermedia") and e.spire Communications, Inc., (formerly known as "American Communications Services, Inc."), and its local exchange operating subsidiaries in Florida, American Communication Services of Tampa, Inc., and American Communication Services of Jacksonville, Inc., ("e.spire") (collectively, "the Parties"), which respectfully represent the following:

ACK _____
AFA _____
APP _____
CAF _____
SMU _____
CTR _____
EAG _____
LEG 3 _____
JIN 5 _____
OPC _____
RCH _____
SEC 1 _____
WAS _____
DTH _____

1. In this consolidated arbitration proceeding, Intermedia and e.spire have requested certain unbundled network elements that have not previously been the subject of arbitration with BellSouth (hereinafter referred to as "New Elements"). Examples of the New Elements requested by Intermedia and e.spire include, but are not limited to, DS-3, OC3, OC12, and OC48 unbundled loops as well as various packet switching elements. Although BellSouth has agreed to provide these elements, the parties have been unable to agree upon the appropriate rates.

RECEIVED & FILED
[Signature]
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER DATE
00679 JAN 19 99
FPSC-BUREAU OF RECORDS/REPORTING

Done
1/22/99

orig Done
leah dt

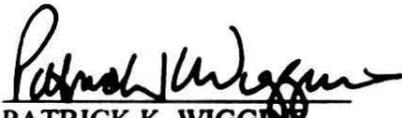
2. In order to assist the Commission in establishing the rates that Intermedia and e.spire should pay for these New Elements, BellSouth is in the process of completing studies to determine the recurring and nonrecurring costs of these elements in Florida. BellSouth has advised, and for purposes of this Joint Motion the Parties agree, that BellSouth is unable to complete all of these cost studies by January 29, 1999, which is the due date established by the Commission for the filing of testimony by BellSouth.

3. Because these cost studies will be an integral part of BellSouth's case and because Intermedia and e.spire will need the cost studies for purposes of filing rebuttal testimony, the Parties respectfully request that the Commission amend the procedural schedule by granting a six-day extension for the filing of testimony by BellSouth and by extending other affected dates by a similar period. Specifically, the Parties jointly move that the Commission establish the following revised due dates:

Testimony (BST)	February 4, 1999
Testimony – Rebuttal (All)	February 25, 1999
Prehearing Statements	February 25, 1999
Notice of Prehearing and Hearing	March 3, 1999

4. Granting this motion will not jeopardize the hearings dates in this matter or the date by which the Commission is expected to resolve this arbitration.

WHEREFORE, the Parties respectfully request that an order be entered, granting this Joint Motion to Amend the Procedural Schedule.



PATRICK K. WIGGINS
Wiggins & Villacorta, P.A.
2145 Delta Boulevard
Suite 200
Tallahassee, FL 32303-4209
(850) 386-6007

and

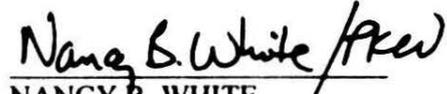
Jonathan E. Canis
Enrico C. Soriano
KELLEY DRYE & WARREN LLP
1200 19th St., N.W., Fifth Floor
Washington, D.C. 20036
(202) 955-9600

and

Scott A. Sapperstein
Senior Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619
(813) 829-4093

**ATTORNEYS FOR INTERMEDIA
COMMUNICATIONS, INC.**

Respectfully Submitted,



NANCY B. WHITE
Museum Tower
150 West Flagler Street
Suite 1910
Miami, FL 33130
(305) 347-5558

WILLIAM J. ELLENBERG II
THOMAS B. ALEXANDER
BENNETT L. ROSS
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375
(404) 335-0750

**ATTORNEYS FOR BELL SOUTH
TELECOMMUNICATIONS, INC.**



NORMAN H. HORTON, JR.
Messer, Caparello & Self
210 South Monroe Street
Suite 701
Tallahassee, FL 32302-1676
(850) 222-0720

Brad E. Mustschelknaus
Marieann Z. Machida
John H. Heitmann
KELLEY DRYE & WARREN LLP
1200 19th St., N.W., Fifth Floor
Washington, D.C. 20036
(202) 955-9600

ATTORNEYS FOR
e.SPIRE COMMUNICATIONS, INC.
AMERICAN COMMUNICATION
SERVICES OF TAMPA, INC.,
AND AMERICAN COMMUNICATION
SERVICES OF JACKSONVILLE, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served on all parties of record by telecopy or Federal Express, postage prepaid, on this the 1st day of January, 1999.



#146745