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May 23, 2000

VIA FEDERAL EXPRESS

Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Joint Response of Broadslate Networks of Florida, Inc. And Florida Digital Network, Inc. in Support of Motion for Extension of Time for Filing Testimony Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find one original and fifteen copies of the Joint Response of Broadslate Networks of Florida, Inc. and Florida Digital Network, Inc. in Support of Motion for Extension of Time for Filing Testimony in Docket No. 990649-TP. Please date stamp and return the extra copy to us in the enclosed self addressed, postage paid envelope.

Pursuant to the memorandum from Beth Keating and Wayne Knight, we also have faxed this material prior to or on May 23, 2000. Thank you very much for your immediate attention to this matter.

Sincerely,



Marc B. Rothschild
Counsel for
Broadslate Networks of Florida, Inc. and
Florida Digital Network, Inc.

- APP _____
- CAE _____
- CMP 5 Enclosures
- COM 5 _____
- CTR _____
- ECR _____ cc: John Spilman
- LEG 2 _____ Mike Gallagher
- OPC _____
- PAI _____
- RGO _____
- SEC 1 _____
- SER _____ 333945.1
- OTH _____

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FPSC-RECORDS/REPORTING

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of)
Unbundled Network Elements)
_____)

Docket No. 990649-TP
Filed May 23, 2000

**JOINT RESPONSE OF BROADSLATE NETWORKS OF FLORIDA, INC. AND
FLORIDA DIGITAL NETWORK, INC. IN SUPPORT OF
MOTION FOR EXTENSION
OF TIME FOR FILING TESTIMONY**

Broadslate Networks of Florida, Inc. ("Broadslate") and Florida Digital Network, Inc. ("FDN") (collectively, the "Movants"), by and through their undersigned counsel, hereby submit this Response in Support of the Motion of AT&T, MCI WorldCom, Inc., and the Florida Competitive Carriers Association For Extension of Time For Filing Testimony. Broadslate and FDN state the following:

1. Broadslate is a certificated ALEC pursuant to Commission Docket No. 991860-TX and intends to offer SDSL services throughout the State of Florida. Broadslate filed a petition to intervene in this proceeding on May 16, 2000, which has yet to be granted by this Commission.
2. Broadslate and FDN intend to file testimony regarding the cost model introduced by BellSouth in this proceeding. Specifically, Movants intend to address BellSouth's proposed loop rates and the cost-prohibitive non-recurring charges proposed for the provision of unbundled copper loops. Movants believe that, given the complexity of the issues underpinning BellSouth's new proposed cost model, delaying the submission of ALEC testimony from June 1 to June 15 is necessary to ensure that a full record is developed before the Commission. Absent an extension of time, Movants and Movants' experts will not have

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the opportunity to fully analyze all aspects of BellSouth's cost model and, therefore, will be prejudiced in their ability to prepare testimony.

3. In order for the Commission to develop a full and fair record, it is imperative that the participants and their experts have a complete understanding of BellSouth's new cost model so that they are able to participate fully in this proceeding. An extension of time would allow the various ALECs to properly analyze all aspects of BellSouth's new cost model and to prepare more meaningful testimony.

CONCLUSION

For the reasons stated above, Broadslate and FDN respectfully request the Commission grant the Motion for Extension of Time for Filing Testimony and allow ALECs at least until June 15 to file testimony in this proceeding.

Respectfully submitted,



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**Counsel for Broadslate Networks of Florida, Inc.
and Florida Digital Network, Inc.**

Dated: May 23, 2000

CERTIFICATE OF SERVICE

I, **Marc B. Rothschild**, **HEREBY CERTIFY** that on the 23rd day of May, 2000, a copy of the foregoing Joint Response of Broadslate Networks of Florida, Inc. And Florida Digital Network, Inc. in Support of Motion for Extension of Time for Filing Testimony in Docket No. 990649-TP was served, via facsimile, on the following parties:

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- BlueStar Networks, Inc.
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Represents: GNAPs

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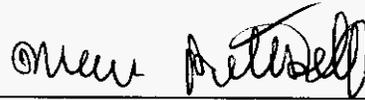
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