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May 31, 2000

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Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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ORIGINAL

Re: UNE Docket No. 990649

Dear Ms. Bayó:

Enclosed for filing on behalf of Rhythms Links Inc. are the original and fifteen copies of its Response In Support Of AT&T'S Motion For Continuance of Hearing.

By copy of this letter, these documents have been furnished to the parties on the attached service list.

Very truly yours,

*Richard D. Melson*

Richard D. Melson

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP 5  
COM 5  
CTR \_\_\_\_\_  
ECR 3  
LEG 2  
OPC \_\_\_\_\_ RDM/kcg  
PAI 4 Enclosures  
RGO \_\_\_\_\_ cc: Parties of Record  
SEC 1  
SER \_\_\_\_\_  
OTH \_\_\_\_\_

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FPSC-BUREAU OF RECORDS

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DOCUMENT NUMBER-DATE

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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 31, 2000

ORIGINAL

**RHYTHMS' RESPONSE IN SUPPORT OF AT&T'S  
MOTION FOR CONTINUANCE OF HEARING**

Rhythms Links Inc. (Rhythms), pursuant to Rule 28-106.303(1), Florida Administrative Code, hereby responds in support of AT&T's Motion for Continuance of Hearing filed on May 25, 2000. As grounds therefor, Rhythms states:

1. Rhythms' consultants have encountered difficulties similar to those experienced by AT&T in their attempts to run BellSouth's new cost model.
2. The time and effort expended in attempting to understand and operate BellSouth's new cost model have limited the amount of time that Rhythms has been able to devote to analyzing the GTE Florida and Sprint models.
3. Both GTE and Sprint have filed revisions or supplements to their cost studies and testimony subsequent to their original filings.
4. Rhythms believes that it is imperative for the Commission to provide additional time for the filing of ALEC testimony directed to the ILEC cost studies. Due to the continuing difficulties with BellSouth's models and the changes to the GTE and Sprint filings, it no longer appears that adequate time can be provided without a delay in the July hearing dates.
5. Rhythms also believes, however, that the Commission should stay in a position to take final action on permanent rates for UNEs before the end of this year.

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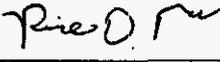
FPSC-RECORDS/REPORTING

6. Rhythms therefore supports AT&T's motion for continuance, subject to the limitation that any continued hearing should be set so as to permit a final Commission decision during 2000.

WHEREFORE, Rhythms urges the Commission to grant AT&T's motion, and to schedule new hearing dates consistent with reaching a final decision during the year 2000.

RESPECTFULLY SUBMITTED this 31st day of May, 2000.

HOPPING GREEN SAMS & SMITH, P.A.

By:   
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*Counsel for Rhythms Links Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivered (\*) or Federal Express (\*\*) this 31st day of May, 2000.

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