



Florida Cable Telecommunications Association

Steve Wilkerson, President

**VIA HAND DELIVERY**

May 31, 2000

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**RE: Docket No. 990649-TP**

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and 15 copies of Florida Cable Telecommunications Association's Response in Support of AT&T's Motion for Continuance of Hearing.

Copies of the Motion have been served on the parties of record pursuant to the attached certificate of service. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

Michael A. Gross  
Vice President, Regulatory Affairs &  
Regulatory Counsel

MAG/mj  
Enclosure

cc: All Parties of Record

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- ✓COM 5 \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR 3 \_\_\_\_\_
- ✓LEG 2 \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI 4 \_\_\_\_\_
- RGO \_\_\_\_\_
- ✓SEC 1 \_\_\_\_\_
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

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RECORDS AND REPORTING

DOCUMENT NUMBER-DATE  
06640 MAY 31 8  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of )  
Unbundling network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Dated: May 31, 2000

ORIGINAL

FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.'S  
RESPONSE IN SUPPORT OF AT&T'S MOTION FOR  
CONTINUANCE OF HEARING

Florida Cable Telecommunications Association, Inc. (FCTA), pursuant to Rule 28-106.303(1), Florida Administrative Code, hereby responds in support of AT&T's Motion for Continuance of Hearing and states:

1. The ability to replicate the results of BellSouth's Cost Model is central to the parties' ability to prepare rebuttal testimony and to prepare for the July hearings in this matter. To date, the parties, including FCTA, have been unable to replicate BellSouth's new Cost Model due to a continuing succession of errors in the model.

2. An inordinate amount of time is being spent trying to understand and operate BellSouth's new Cost Model, and the parties, including FCTA, are not in the position to file adequate rebuttal testimony or to prepare for the July hearings.

3. As a result of FCTA's inability to run and manipulate the Model to enable its witness to prepare and file FCTA's testimony, FCTA is unable to adequately prepare for the July hearings.

WHEREFORE, FCTA supports AT&T's Motion for Continuance and respectfully requests that the Commission grant said Motion.

DOCUMENT NUMBER - DATE

06640 MAY 31 8

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Respectfully submitted this 31<sup>st</sup> day of May, 2000.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Cable Telecommunications Association's Response in Support of AT&T's Motion for Continuance of Hearing in Docket 990649-TP has been served upon the following parties by U.S. Mail this 31<sup>st</sup> day of May, 2000:

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