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August 17, 2000

**ORIGINAL**  
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RECORDS AND REPORTING

**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 990649-TP

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies of Joint ALEC Response to BellSouth's Motion for Extension of Time in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

  
Floyd R. Self


FRS/amb

Enclosure

Parties of Record

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- CAF
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DOCUMENT NUMBER-DATE

10051 AUG 17 8

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649-TP  
Filed: August 17, 2000

**JOINT ALEC RESPONSE TO  
BELLSOUTH'S MOTION FOR EXTENSION OF TIME**

AT&T Communications of the Southern States, Broadslate Networks, Inc., Cleartel Communications, Inc., Covad Communications Company, Florida Cable Telecommunications Association, Florida Digital Network, MCI WorldCom, Inc., Rhythm Links, Inc. and Time Warner Telecom of Florida, L.P. (hereinafter, the "Joint Respondents"), pursuant to Rule 28-106.204, Florida Administrative Code, and the Prehearing Officer's request for expedited responses, hereby file this Joint Response to BellSouth Telecommunications, Inc.'s ("BellSouth"), August 16, 2000 Motion for Extension of Time.

1. Without addressing the issue of BellSouth's interpretation of the Commission's Order Modifying Procedure, the Joint Respondents do not object to the relief requested by BellSouth in its Motion.

2. However, having reviewed the summary report of the changes in BellSouth's proposed UNE rates as a result of its revised cost studies and the general description of the changes to BellSouth's cost studies, the Joint Respondents are concerned as to their ability to file meaningful supplemental rebuttal testimony addressing BellSouth's revised cost studies in the short amount of

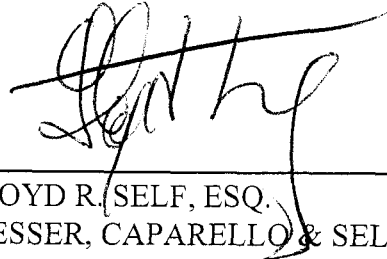
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10051 AUG 17 8  
FPSC-RECORDS/REPORTING

time that is available under the present schedule modified by BellSouth's extension. The number of changes to BellSouth's cost studies appears substantial, and a significant number of proposed UNE prices have changed as a result of the revised cost studies. Moreover, it does not appear that BellSouth will file testimony describing in any detail all of those changes and the rationale for each change until it files its supplemental testimony on August 21, 2000. Accordingly, the Joint Respondents will require some additional time in which to file their respective supplemental rebuttal testimony and exhibits addressing BellSouth's revised cost studies. The Joint Respondents request that they have until 5:00 p.m. Monday, August 28, 2000 to file any such supplemental rebuttal testimony and exhibits. This further extension will allow the Joint Respondents 10 days to review the new cost studies and a week to review BellSouth's narrative description of its revisions to the cost studies. Such testimony and supporting exhibits will be strictly limited to the revisions to BellSouth's cost studies, and the effect of those revisions on the rebuttal testimony filed by the respective Joint Respondents and the proposed changes to BellSouth's cost studies advocated by the Joint Respondents' respective witnesses. Such additional amount of time will not prejudice any party and should have no impact on the remaining schedule in this proceeding, including the hearing dates.

3. In not objecting to BellSouth's requested extension and requesting additional time for the Joint Respondents' own supplemental rebuttal testimony, the Joint Respondents further request that all parties continue to be required to serve their modified testimony by hand delivery, facsimile, or overnight courier, and by electronic service (where possible) pursuant to Order No. PSC-00-1335-PCO-TP, issued July 24, 2000.

4. Undersigned counsel has been authorized by each of the carriers identified above to execute this Joint Response on their behalf.

Respectfully submitted this 17<sup>th</sup> day of August, 2000.

A handwritten signature in black ink, appearing to read "Floyd R. Self", written over a horizontal line.

FLOYD R. SELF, ESQ.  
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing in Docket No. 990649-TP has been furnished by Hand Delivery (\*) and/or U. S. Mail to the following parties of record this 17th day of August, 2000:

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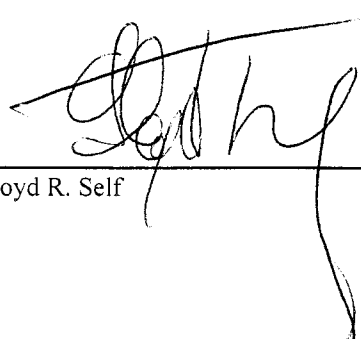
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