

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

Petition for Arbitration of the)
Interconnection Agreement between)
BellSouth Telecommunications, Inc. and)
Supra Telecommunications & Information)
Systems, Inc. pursuant to Section 252(b))
of the Telecommunications Act of 1996)
_____)

Docket No. 00-1305-TP
Dated: September 26, 2000

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MOTION FOR EXTENSION OF TIME
TO SERVE RESPONSE TO BELLSOUTH'S
AND ADD ISSUES TO THE ARBITRATION

RESPONDENT SUPRA TELECOMMUNICATIONS & INFORMATION

SYSTEM'S INC. ("Supra Telecom"), by and through its undersigned counsel, hereby moves this Commission for leave to serve its response to BELLSOUTH TELECOMMUNICATIONS, INC.'s ("BellSouth") petition (together with the addition of other issues for arbitration) on Monday, October 2, 2000, and in support thereof states as follows:

1. On or about September 1, 2000, BellSouth filed the instant petition for arbitration of disputes arising from the negotiations of a new interconnection agreement.
2. Pursuant to 47 U.S.C. § 252(b)(2)(B), BellSouth was to provide Supra Telecom a copy of the petition on or before the filing date; and then under § 252(b)(3), Supra Telecom would have twenty-five (25) days in which to respond and raise additional issues for arbitration.
3. Unfortunately, BellSouth did not provide Supra Telecom a copy of the arbitration petition on or before the filing date. Rather, BellSouth attempted to overnight the petition on Friday, September 1, 2000. Given the holiday weekend, the next business day was Tuesday, September 5, 2000. In any event, the petition was also apparently mis-directed.

4. Irrespectively of the misdelivery, using BellSouth's certificate of service, the petition would have been received by Supra Telecom on the next business day after service (i.e. Tuesday,

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September 5, 2000). Under 47 U.S.C. § 252(b)(3), Supra Telecom would have twenty-five (25) days in which to serve its response (i.e. Saturday, September 30, 2000). Since the twenty-fifth day falls on a weekend, the response date should be Monday, October 2, 2000.

5. Supra Telecom attempted to contact counsel for BellSouth regarding this matter, but was unable to reach him and thus left a message. Given the fact that the statute allows Supra Telecom twenty-five (25) days from service in which to present its response, the undersigned does not believe that BellSouth should have any objections to this request. Thus Supra Telecom respectfully requests that this Commission grant this motion and allow Supra Telecom until Monday, October 2, 2000 in which to serve its response to BellSouth's petition in this docket.

WHEREFORE SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC., respectfully requests that this Commission to grant it leave to serve its response to BELLSOUTH TELECOMMUNICATIONS, INC.'s petition and to raise additional issues for arbitration, on Monday, October 2, 2000.

Respectfully submitted, this 26th day of September, 2000.

MARK BUECHELE, ESQ.
SUPRA TELECOMMUNICATIONS &
INFORMATION SYSTEMS, INC.
2620 S.W. 27th Avenue
Miami, Florida 33133
Tel.: (305) 531-5286
Fax.: (305) 531-5287


MARK E. BUECHELE
FLORIDA BAR NO. 906700

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. Mail on NANCY B. WHITE c/o NANCY H. SIMS, 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556 and MICHAEL P. GOGGIN, 150 West Flagler Street, Suite 1910, Miami, Florida 33130, this 26th day of September, 2000.

Mark E. Buechele/sma
MARK E. BUECHELE
FLORIDA BAR NO. 906700