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ORIGINAL

October 17, 2000

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(850) 413-6770

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Re: BellSouth v. Supra Telecom, Docket No. 00-1305-TP

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen (15) copies of the Respondent Supra Telecommunication & Information Systems, Inc.'s Motion For Extension Of Time To File Response To BellSouth's Petition For Arbitration. Please also find enclosed an extra copy of the filing, for which we request that you stamp with the filing date and return in the enclosed postage pre-paid, self-addressed envelope.

If you have any questions or comments, please feel free to contact me at (305) 531-5286.

Sincerely,

Mark E. Buechele

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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

Petition for Arbitration of the )  
Interconnection Agreement between Bell- )  
South 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: October 17, 2000

MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE TO BELLSOUTH'S  
PETITION FOR ARBITRATION

RESPONDENT SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEM'S  
INC. ("Supra Telecom"), by and through its undersigned counsel, hereby moves this  
Commission for leave to accept as filed its response to BELLSOUTH  
TELECOMMUNICATIONS, INC.'s ("BellSouth") petition (together with the addition of other  
issues for arbitration), 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. The petition was not  
served upon Supra Telecom until on or after September 5, 2000.
2. Under the Florida Model Rules of Procedure ("Model Rules") which govern these  
administrative proceedings, a respondent need not file an answer or response to a petition. See  
Model Rule 28-106.203. Additionally, although a respondent may file an answer, nothing in  
Model Rules sets forth the time period in which to file such a response.
3. In this circumstances, the proposed interconnection agreement attached to BellSouth's  
petition for arbitration was provided to Supra Telecom for the very first time with the petition.  
Therefore, to a certain extent, the proposed interconnection agreement contained items  
unfamiliar to Supra Telecom.
4. Supra Telecom initially requested an opportunity to serve its response to the petition

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on October 3, 2000. At that time, Supra Telecom did serve and attempt to file a response by U.S. Mail, however, apparently a problem arose in the mails as a result of the extensive flooding which occurred in South Florida during that time period. It was not until recently that Supra Telecom learned that a problem existed with the response arriving at the Commission.


5. Given the above circumstances and the fact that the Model Rules do not set forth a time period for filing a response, Supra Telecom respectfully requests that its response and answer be accepted as filed.

6. Supra Telecom also notes at this time that the time period for beginning negotiations under this interconnection agreement did not begin until June 9, 2000, and thus the earliest a petition for arbitration should have been filed is October 23, 2000. Thus Supra Telecom notes that BellSouth's petition is premature. Although not a part of this motion, Supra Telecom intends to ask that this Commission stay proceedings to require BellSouth to complete negotiations in good faith as required by 47 U.S.C. § 252.

**WHEREFORE SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC.**, respectfully requests that this Commission accept as filed Supra Telecom's response and answer to **BELLSOUTH TELECOMMUNICATIONS, INC.**'s petition.

Respectfully submitted, this 17th day of October, 2000.

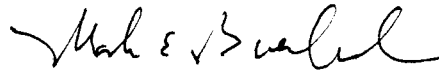
MARK BUECHELE, ESQ.  
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MARK E. BUECHELE  
FLORIDA BAR NO. 906700

**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 17th day of October, 2000.



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MARK E. BUECHELE  
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