

ORIGINAL

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November 7, 2000

## VIA HAND DELIVERY

Blanca S. Bayo, Director  
Division of Records and Reporting  
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RECORDS AND REPORTING

Re: Docket No.: 990649-TP

Dear Ms. Bayo:

On behalf of Florida Competitive Carriers Association, enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Motion for Extension of Time to File Post-Hearing Briefs.

Please acknowledge receipt of the above on the extra copy of each for return of the stamped copies to me. Thank you for your assistance.

Yours truly,

Joseph A. McGlothlin

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

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

Docket No. 990649-TP

Filed: November 7, 2000

MOTION FOR EXTENSION OF TIME TO FILE  
POST-HEARING BRIEFS

The Florida Competitive Carriers Association (FCCA), through its undersigned counsel, moves for an order extending the time for the filing of post-hearing briefs to and including November 21, 2000, and in support states:

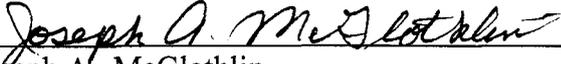
1. Under the existing schedule, post-hearing briefs in the above docket are due on November 13, 2000.
2. The briefs in this case will address both Phase I and Phase II of the evidentiary hearings held in the above docket. Accordingly, it is necessary to consult the records of both phases to prepare the briefs.
3. Many of the ALECs who participated actively in the hearing process are now attempting to coordinate the preparation of their post-hearing briefs. The effort is intended to reduce the number of briefs and/or eliminate duplicative arguments. To the extent the effort is successful, it will streamline the consideration of parties' positions by the Staff and the Commissioners. However, the coordination of such efforts among multiple parties is time-consuming. The extension sought by this motion is for the purpose of facilitating this effort.

4. While FCCA requests the extension of time, it is imperative to FCCA and the ALECs with whom FCCA is coordinating that there be no delay in the decision of this case. Given that the Staff's recommendation is not due until February 28, 2001, FCCA files this motion based on its belief that the present schedule will accommodate this extension without affecting the remainder of the procedural milestones, particularly in view of the fact that the parties joining in the motion will use the additional time to streamline the decision-making process.

5. The undersigned has consulted representatives of AT&T Communications of the Southern States, Inc., MCI WorldCom, Inc., Covad Communications Company, BlueStar Networks, Inc., Florida Cable Telecommunications Association, Z-Tel Communications, Inc., Intermedia Communications, Inc., Broadslate Networks of Florida, Inc., Cleartel Communications, Inc., and Florida Digital Network. The undersigned is authorized to represent that the above companies join in and support this motion.

The undersigned has also contacted the attorneys for Sprint-Florida, Incorporated (Sprint) and BellSouth Telecommunications, Inc. (BellSouth), and is authorized to represent that Sprint does not oppose the motion. BellSouth opposes the motion if it would have the effect of delaying the decision date in this docket. If the granting of the motion would have no impact on the decision date, BellSouth does not oppose the requested extension.

**WHEREFORE**, FCCA requests an extension to and including November 21, 2000 for the filing of post-hearing briefs in the above docket.

  
\_\_\_\_\_  
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Attorneys for Florida Competitive Carriers  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the Motion for Extension of Time to File Post-Hearing Briefs has been furnished by hand delivery(\*) or U.S. mail this 7th day of November, to:

(\*)Beth Keating

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