GREENBERG ATTORNEYS TRAURIG

ORIGINAL

RECEIVED-FPSC

01 MAR 29 PM 4:27

RECOHDS AND REPORTING

March 29, 2001

Blanca S. Bayo, Director Division of Records and Reporting Public Service Commission 4750 Esplanade Way, Room 110 Tallahassee, FL 32399

Re: Docket No. 001436-TP

Dear Ms. Bayo:

Enclosed are seven (7) copies of Pilgrim Telephone, Inc.'s Motion to Defer Agenda Item in the above docket.

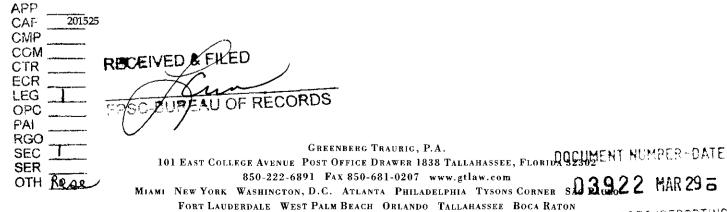
We have also enclosed a copy of the document on diskette, prepared in Microsoft Word 7.0 on a Windows 95 operating system. The diskette is a "2HD" density and 1.44 MB.

Thank you in advance for your assistance.

Sincerely yours,

Seann M. Frazier

Enclosures SMF/skl



FPSC-RECORDS/REPORTING

Before the PUBLIC SERVICE COMMISSION of the STATE OF FLORIDA

In the Matter of

PETITION FOR ARBITRATION OF PILGRIM TELEPHONE, INC. PURSUANT TO SECTION 252(b) OF THE COMMUNICATIONS ACT OF 1934, AS AMENDED BY THE TELECOMMUNICATIONS ACT OF 1996

DOCKET NO. 001436-TP

MOTION TO DEFER AGENDA ITEM

Pilgrim Telephone, Inc. ("Pilgrim"), through counsel, submits the following Motion to Defer Consideration of Staff's Recommendation in Docket No. 001436-TP, stating:

1. Counsel for the PSC made their recommendation on items pending in this docket available Friday, March 23, 2001. The matter set for consideration on the Agenda scheduled for Tuesday, April 3, 2001.

2. Counsel for Pilgrim is unavailable for argument in response to Staff recommendations on April 3, 2001.

3. Counsel for Pilgrim has contacted counsel for BellSouth and PSC staff and is able to report that no party has an objection to the deferral of this matter until next available agenda.

> DOCUMENT NUMBER-DATE 03922 HAR 295 FPSC-RECORDS/REPORTING

WHEREFORE, based on the foregoing good cause, counsel for Pilgrim respectfully requests that consideration of the matters pending in Docket No. 001436-TP be deferred until the next available Agenda.

Respectfully submitted,

SEANN M. FRAZIER Greenberg Traurig, LLP 101 East College Avenue Post Office Drawer 1838 Tallahassee, Florida 32302 (850) 222-6891

Walter Steimel, Jr. John Cimko Nancy E. Boocker Greenberg Traurig, LLP 800 Connecticut Avenue, N.W. Suite 500 Washington, D.C. 20006 (202) 452-4893

By: .

Counsel for Pilgrim Telephone, Inc.

CERTIFICATE OF SERVICE

Docket No. 001436-TP

I hereby certify that a copy of the foregoing was served upon the following, as indicated, this 29th day of March, 2001.

Wayne Knight Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 VIA HAND DELIVERY

R. Douglas Lackey A. Langley Kitchings Patrick Turner BellSouth Telecommunications, Inc. Suite 4300 675 W. Peachtree Street Atlanta, Georgia 30375 **VIA U.S. MAIL** Sally Simmons Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 **VIA HAND DELIVERY**

Nancy B. White Jim Mezzan BellSouth Telecommunications, Inc. Suite 1910 150 West Flagler Street Miami, Florida 33130 VIA U.S. MAIL Facijimile and

By: 🖕

Counsel for Pilgrim Telephone, Inc.

201522