

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies.

DOCKET NO. 000121-TP  
FILED: APRIL 11, 2001

MOTION TO EXTEND DISCOVERY CUTOFF DATE

Commission staff (staff), by and through undersigned counsel, pursuant to Rule 28-106.204, Florida Administrative Code, hereby requests to extend the discovery cutoff date by one day or until staff's depositions are completed and as grounds therefor states:

1. This matter has been scheduled for an administrative hearing on April 25, 26, and 27, 2001. Pursuant to Order No. PSC-01-0242-PCO-TP, issued January 26, 2001, all discovery was to be completed by April 18, 2001, unless extended by the Prehearing Officer for good cause shown.

2. Staff believes that it is necessary to conduct depositions of certain witnesses in this proceeding to be able to present a more complete record to the Commission.

3. Staff was unable to schedule all these depositions prior to April 18, 2001, because of the witnesses' schedules. Currently, staff's depositions are scheduled for April 16, 2001, April 18, 2001, and April 19, 2001. The parties' sponsoring these witnesses were contact by telephone and had no objection to the extension of the discovery cutoff deadline.

4. Due to the time constraints, staff contacted the parties of record other than those sponsoring the witnesses to be deposed by facsimile and requested that any objection to going beyond the discovery cutoff date be made within 24 hours. The notice of staff's deposition along with staff's request for objection were sent April 5, 2001. However, due to transmittal problems, the facsimile was sent again to several parties on April 6, 2001. To date, these parties have not objected to the extension of the discovery cutoff date.

APP  
CAF  
CMP  
COM  
CTR  
ECR  
LEG  
OPC  
PAI  
RGO  
SEC  
SER  
OTH

DOCUMENT NUMBER-DATE

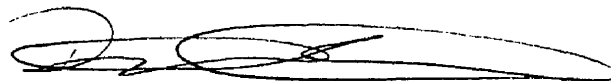
04481 APR 11 01

FPSC-RECORDS/REPORTING

MOTION TO EXTEND DISCOVERY CUTOFF DATE  
DOCKET NO. 000121-TP  
PAGE 2

WHEREFORE, Commission staff moves the Prehearing Officer to extend the discovery cutoff date by one day or until staff's depositions are completed.

Respectfully Submitted this 11 day of April, 2001.



---

Patricia A. Christensen, Senior Attorney  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
(850) 413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies.

DOCKET NO. 000121-TP  
FILED: APRIL 11, 2001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of COMMISSION STAFF'S MOTION TO EXTEND THE DISCOVERY CUTOFF DATE has been furnished by regular U.S. Mail and facsimile, this 11th day of April, 2001, to the following:

Ms. Marsha Rule  
AT&T Communications of the  
Southern States, Inc.  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301-1549

Ms. Nancy B. White  
c/o Nancy H. Sims  
BellSouth Telecommunications,  
Inc.  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301-1556

Ms. Monica Barone  
Birch Telecom of the South,  
Inc.  
8001 Fairlake Drive  
Wake Forest, NC 27587

Mr. Tad J. Sauder  
Birch Telecom of the South,  
Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108-1914

Mr. Jeremy Marcus  
Ms. Elizabeth Braman  
Blumenfeld & Cohen  
1625 Massachusetts Ave., NW  
Suite 300  
Washington, DC 20036

Ms. Catherine F. Boone  
Regional Counsel  
Covad Communications Company  
10 Glenlake Parkway, Suite 650  
Atlanta, GA 30328-3495

Mr. Michael A. Gross  
Florida Cable  
Telecommunications Assoc.,  
Inc.  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

Mr. Richard Melson  
Hopping Law Firm  
P.O. Box 6526  
Tallahassee, FL 32314

MOTION TO EXTEND DISCOVERY CUTOFF DATE  
DOCKET NO. 000121-TP  
PAGE 4

Mr. Charles Pellegrini  
Mr. Patrick Wiggins  
Katz, Kutter Law Firm  
12th Floor  
106 East College Avenue  
Tallahassee, FL 32301

Mr. John D. McLaughlin, Jr.  
KMC Telecom Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043

Mr. Joseph McGlothlin  
Ms. Vicki Kaufman  
McWhirter Law Firm  
117 S. Gadsden St.  
Tallahassee, FL 32301

Ms. Kimberly A. Scardino  
Rhythms Links Inc.  
Suite 300  
1625 Massachusetts Ave., N.W.  
Washington, DC 20036

Mr. Wayne Stavanja  
Mr. Mark Buechele  
Supra Telecom  
1311 Executive Center Drive,  
Suite 200  
Tallahassee, FL 32301

Ms. Kimberly Caswell  
Verizon Select Services Inc.  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

Mr. Jonathan Canis  
Mr. Michael Hazzard  
Kelley Law Firm  
1200 19th St. NW, Fifth Floor  
Washington, DC 20036

Ms. Donna C. McNulty  
MCI WorldCom  
325 John Knox Road  
The Atrium, Suite 105  
Tallahassee, FL 32303-4131

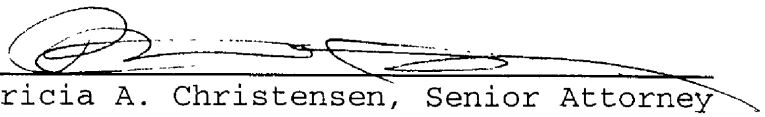
Mr. Peter Dunbar  
Ms. Karen Camechis  
Pennington Law Firm  
P.O. Box 10095  
Tallahassee, FL 32302-2095

Ms. Susan Masterton  
Mr. Charles Rehwinkel  
Sprint Communications Company  
Limited Partnership  
P.O. Box 2214  
MC: FLTLHO0107  
Tallahassee, FL 32316-2214

Ms. Carolyn Marek  
Time Warner Telecom of  
Florida, L.P.  
233 Bramerton Court  
Franklin, TN 37069

Mr. John Rubino  
Mr. George S. Ford  
Z-Tel Communications, Inc.  
601 S. Harbour Island Blvd.  
Tampa, FL 33602-5706

MOTION TO EXTEND DISCOVERY CUTOFF DATE  
DOCKET NO. 000121-TP  
PAGE 5



Patricia A. Christensen, Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
(850) 413-6199