

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
MARTIN P. McDONNELL

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

J. STEPHEN MENTON
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE
GOVERNMENTAL CONSULTANTS
MARGARET A. MENDUNI
M. LANE STEPHENS

May 2, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

RECEIVED-FPSC
01 MAY -2 PM 4:37
RECORDS AND REPORTING

Re: Docket No. 000075-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of A&T Communications of the Southern States, Inc., TCG of South Florida, Global NAPS, MediaOne Florida Telecommunications, Inc., Time Warner of Florida, LP, Florida Cable Telecommunications Association, Inc., Allegiance Telecom of Florida, Inc. and the Florida Competitive Carriers Association, are the original and fifteen copies of a Joint Motion for Extension of Time to File Supplemental Posthearing Brief.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Martin P. McDonnell

Martin P. McDonnell

- APP
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Enclosures
cc: All Parties of Record

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DOCUMENT NUMBER-DATE
05561 MAY-26
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate )
methods to compensate carriers for )
exchange of traffic subject to Section 251 )
of the Telecommunications Act of 1996. )
\_\_\_\_\_)

Docket No. 000075-TP

Filed: May 2, 2001

JOINT MOTION FOR EXTENSION OF TIME
TO FILE SUPPLEMENTAL POSTHEARING BRIEF

AT&T Communications of the Southern States, Inc., TCG of South Florida, Global NAPS,
Inc., MediaOne Florida Telecommunications, Inc., Time Warner Telecom of Florida, LP, Florida
Cable Telecommunications Association, Inc., Allegiance Telecom of Florida, Inc. and the Florida
Competitive Carriers Association, by and through the undersigned counsel, respectfully move the
Commission for a forty-five day extension of time to file a Supplemental Posthearing Brief in Phase
I of the instant docket. As grounds therefor Joint Movants state:

1. On Friday, April 27, 2001, the Commission issued Order No. PSC-01-1036-PCO-TP
requiring all parties in this proceeding to file supplemental posthearing briefs addressing the decision
of the Federal Communications Commission in CC Dockets Nos. 96-98 and 99-68 ("FCC Order"),
within ten days of the issuance of the FCC Order. Undersigned counsel received a copy of the
Order from the Commission on Wednesday, May 2, 2001, but was first made aware of the Order in
the late afternoon hours of Tuesday, May 1, 2001.

2. The FCC Order was issued April 27, 2001, and pursuant to Commission Order No.
PSC-01-1036-PCO-TP, supplemental briefs addressing the FCC Order would be due, Monday, May
7, 2001.

3. The Joint Movants will be unable to complete and file a supplemental posthearing
brief addressing the 72-page decision of the Federal Communications Commission as set forth in

DOCUMENT NUMBER-DATE

05561 MAY-20

FPSC-RECORDS/REPORTING

the Commission Order by May 7, 2001, for a number of reasons, including:

a) The FCC Order, although not yet final, is lengthy and potentially implicates every significant issue raised in Phase I of this generic docket including the jurisdiction of the Commission to determine reciprocal compensation for ISP traffic, the appropriate rates for ISP traffic, the intrastate or interstate nature of ISP traffic, the retroactivity of FCC imposed rates for ISP traffic, and the viability of current intercarrier agreements dealing with ISP traffic.

b) The FCC Order is inextricably tied to another lengthy Order released by the FCC on April 27, 2001, a Notice of Proposed Rulemaking regarding existing intercarrier compensation regulations and regimes.

c) Counsel for the Joint Movants have pre-existing commitments and matters which leave little, if any, reasonable time to review the FCC Order and related documents and prepare the supplemental posthearing brief by May 7, 2001.

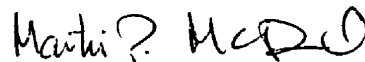
4. The ALECs and associations sponsoring this motion respectfully request a reasonable amount of time to allow each individual party to review, analyze and comprehend the impact of the FCC Order. It is the intent of the Joint Movants, in the interest of efficiency, to file a joint supplemental brief with the Commission which succinctly states the position of the Joint Movants. In order to effectively do so, it is imperative that the Movants herein be granted sufficient time to prepare a joint supplemental posthearing brief with this Commission that adequately sets forth the positions of the respective Joint Movants regarding the FCC Order and its impact on this docket.

5. The undersigned has contacted counsel for all parties and is authorized to represent that there is no objection to the granting of a forty-five day extension to all parties to file supplemental posthearing briefs addressing the April 27, 2001 Order of the FCC. Further, there is

no objection to a reasonable extension of the due dates for the Staff Recommendation and Commission consideration of the Staff Recommendation to accommodate this request.

WHEREFORE, the Joint Movants respectfully request that the Commission grant a forty-five day extension of time to file supplemental posthearing briefs addressing the decision of the FCC in CC Docket No. 96-98 and 98-96, and any other relief as deemed appropriate.

Respectfully submitted,



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Kenneth A. Hoffman, Esq.  
Martin P. McDonnell, Esq.  
Rutledge, Ecenia, Purnell & Hoffman, P.A.  
P. O. Box 551  
Tallahassee, FL 32302  
(850) 681-6788 (Telephone)  
(850) 681-6515 (Telecopier)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 2<sup>nd</sup> day of May, 2001:

Felicia Banks, Esq.  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 370  
Tallahassee, Florida 32399-0850

Elizabeth Howland  
Allegiance Telecom, Inc.  
1950 Stemmons Freeway, Suite 3026  
Dallas, TX 75207-3118

Morton Posner, Esq.  
Regulatory Counsel  
Allegiance Telecom, Inc.  
1150 Connecticut Avenue, N.W.  
Suite 205  
Washington, DC 20036

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

James Meza, III, Esq.  
BellSouth Telecommunications, Inc.  
Legal Department  
Suite 1910  
150 West Flagler Street  
Miami, Florida 33130

James C. Falvey, Esq.  
e.spire Communications, Inc.  
131 National Business Parkway  
Suite 100  
Annapolis Junction, MD 20701

Michael A. Gross, Esq.  
Florida Cable Telecommunications, Asso.  
246 East 6<sup>th</sup> Avenue  
Tallahassee, FL 32303

Mr. Paul Rebey  
Focal Communications Corporation of Florida  
200 North LaSalle Street, Suite 1100  
Chicago, IL 60601-1914

Global NAPS, Inc.  
10 Merrymount Road  
Quincy, MA 02169

Scott Sapperstein  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309

Donna Canzano McNulty, Esq.  
MCI WorldCom  
325 John Knox Road, Suite 105  
Tallahassee, FL 32303-4131

Norman Horton, Jr., Esq.  
Messer Law Firm  
215 S. Monroe Street, Suite 701  
Tallahassee, FL 32301-1876

Jon Moyle, Esq.  
Cathy Sellers, Esq.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301

Herb Bornack  
Orlando Telephone Company  
4558 SW 35<sup>th</sup> Street, Suite 100  
Orlando, FL 32811-6541

Peter Dunbar, Esq.  
Karen Camechis, Esq.  
P. O. Box 10095  
Tallahassee, FL 32302-2095

Charles R. Rehwinkel, Esq.  
Susan Masterton, Esq.  
Sprint-Florida, Incorporated  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, FL 32316

Mark Buechele  
Supra Telecom  
1311 Executive Center Drive, Suite 200  
Tallahassee, Florida 32301

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

Charlie Pellegini, Esq.  
Patrick K. Wiggins, Esq.  
P. O. Drawer 1657  
Tallahassee, Florida 32302

Robert Scheffel Wright, Esq.  
John T. LaVia, III, Esq.  
P. O. Box 271  
Tallahassee, FL 32302

Wanda G. Montano, Esq.  
US LEC Corporation  
Morrocroft III  
6801 Morrison Boulevard  
Charlotte, NC 28211

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

Joseph A. McGlothlin, Esq.  
Vicki Gordon Kaufman, Esq.  
117 South Gadsen Street  
Tallahassee, FL 32301

Michael R. Romano, Esq.  
Level 3 Communications, LLC  
1025 Eldorado Boulevard  
Broomfield, Colorado 80021

Marsha Rule, Esq.  
AT&T  
101 North Monroe Street, Suite 700  
Tallahassee, FL 32301-1549

Richard D. Melson, Esq.  
Hopping Green Sams & Smith, P.A.  
P. O. Box 6526  
Tallahassee, FL 32314

By: Martha P. McDowell for  
KENNETH A. HOFFMAN, ESQ.

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