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Legal Department

JAMES MEZA III  
Attorney

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BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

RECORDS AND  
REPORTING

May 23, 2001

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 010740-TP (IDS Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*James Meza III*  
James Meza III (KA)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

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*[Signature]*  
FPSC-BUREAU OF RECORDS

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 010740-TP**


I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(\*) Facsimile and U.S. Mail this 23rd day of May, 2001 to the following:

Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Suzanne Fannon Summerlin (\*)  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, Florida 32301  
Tel. No. (850) 656-2288  
Fax. No. (850) 656-5589  
summerlin@nettally.com  
Represents IDS

IDS Long Distance, Inc.  
n/k/a IDS Telcom, LLC  
1525 N.W. 167th Street  
Second Floor  
Miami, Florida 33169

  
James Meza III (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc. ) Docket No.: 010740-TP  
n/k/a IDS Telecom, L.L.C., Against )  
BellSouth Telecommunications, Inc., and )  
Request for Emergency Relief ) Filed: May 23, 2001  

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
MOTION FOR EXTENSION OF TIME**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204(5), Florida Administrative Code, requests that the Florida Public Service Commission ("Commission") grant it a twenty (20) day extension of time or until June 25, 2001, in which to respond to IDS Long Distance, Inc. n/k/a IDS Telcom, L.L.C.'s ("IDS") Complaint and Request for Emergency Relief ("Complaint"). In support of this motion, BellSouth states the following:

1. On May 11, 2001, IDS filed its Complaint. IDS served the Complaint on BellSouth via U.S. mail on that same date. Accordingly, under Rules 28-106.204(5) and 28-106.103, Florida Administrative Code, BellSouth's response is due on June 5, 2001 (twenty (20) days from service plus five (5) days for U.S. mail).

2. IDS's Complaint consists of thirty-four (34) pages of factually intensive allegations. In addition, attached as exhibits to IDS's Complaint, are thirteen (13) alleged customer affidavits. A twenty (20) day extension of time in which to respond is necessary to allow BellSouth to adequately investigate and respond to IDS's voluminous Complaint and third-party exhibits.


3. IDS would not be prejudiced by a twenty (20) day extension of time and the Commission would benefit from receiving an informed response to the Complaint. IDS's request for emergency relief does not require a different conclusion because, as evidenced by the third-party affidavits attached to IDS's Complaint, the acts complained of by IDS occurred several months ago in some instances, with the winback complaints allegedly occurring between February and mid-April, 2001. IDS presented no third-party affidavits to suggest that the winback activities complained of are continuing in nature. Moreover, the Commission has yet to set IDS's request for emergency relief for hearing and thus an extension of time will not delay that hearing, assuming one will be established.

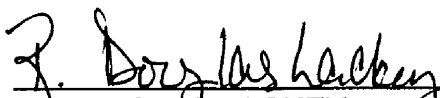
4. IDS's counsel represented to BellSouth that IDS would not consent to any extension of time.

**WHEREFORE**, for the foregoing reasons, BellSouth respectfully requests that the Commission grant it a twenty (20) day extension of time or until June 25, 2001 in which to respond to IDS' Complaint.

Respectfully submitted this 23rd day of May, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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NANCY B. WHITE (KA)  
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c/o Nancy H. Sims  
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