JAMES MEZA III Attorney

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

July 30, 2001

Mrs. Blanca S. Bayó Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: Docket No. 000731-TP (AT&T Arbitration)

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 Mena III James Meza III

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

> DOCUMENT NUMBER - DATE 09278 JUL 30 5 FPSC-COLD-HSSION CLERK

# CERTIFICATE OF SERVICE Docket No. 000731-TP

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

Electronic Mail and U.S. Mail this 30th day of July, 2001 to the following:

Lee Fordham
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
cfordham@psc.state.fl.us

Rhonda P. Merritt
AT&T Communications of the Southern
States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6365
Fax. No. (850) 425-6361
rmerritt@att.com

Roxanne Douglas
AT&T Communications of the Southern
States, Inc.
1200 Peachtree Street, N.W.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-8670
rxdouglas@att.com

James Meza III

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Petition by AT&T Communications of the Southern States, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. pursuant to 47 U.S.C. Section 252 Filed

Docket No. 000731-TP

Filed: July 30, 2001

## MOTION FOR EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth") requests that the Florida Public Service Commission ("Commission") grant an extension of time of thirty (30) days from the date the Commission issues a final order disposing of BellSouth's and AT&T Communications of the Southern States, Inc.'s ("AT&T") Motions for Reconsideration and BellSouth's Cross-Motion for Clarification to file an executed interconnection agreement.

Pursuant to Order No. PSC-01-1402-FOF-TP ("Order"), the parties are required to file a final executed interconnection agreement with the Commission on July 30, 2001. On July 13, 2001, both AT&T Communications of the Southern States, Inc. (AT&T") and BellSouth filed a Motion for Reconsideration as to the Commission's Order, wherein the parties asked the Commission to revisit its ruling regarding several issues. On July 25, 2001, BellSouth filed a Cross-Motion for Clarification. Because the Commission has yet to rule on each party's Motion for Reconsideration and BellSouth's Cross-Motion for Clarification, it would be premature to execute a final agreement at this time.

Accordingly, BellSouth requests an extension of time of thirty (30) days from the date the Commission issues a final order disposing of each party's

Motion for Reconsideration and BellSouth's Cross-Motion for Clarification to file an executed interconnection agreement. BellSouth submits that the extension will not prejudice any party.

BellSouth understands that counsel for AT&T is in agreement with the above referenced extension of time. However, BellSouth was unable to obtain counsel's consent to file a Joint Motion prior to filing the instant pleading.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that this Commission grant them an extension of time of thirty (30) days from the date the Commission issues a final order disposing each party's Motion for Reconsideration and BellSouth's Cross-Motion for Clarification to file an executed interconnection agreement.

Respectfully submitted this 30<sup>th</sup> day of July, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE
JAMES MEZA III
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5558

R. DOUGLAS LACKEY E. EARL EDENFIELD, JR. 675 West Peachtree Street, #4300 Atlanta, Georgia 30375 (404) 335-0747

402858

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by AT&T Communications of	)	Docket No. 000731-TP
the Southern States, Inc. for arbitration	)	
of certain terms and conditions of a	)	
proposed agreement with BellSouth	)	
Telecommunications, Inc. pursuant to	)	
47 U.S.C. Section 252	)	Filed: July 30, 2001

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BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

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150 South Monroe Street, #400

Tallahassee, Florida 32301

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