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August 6, 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

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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 to File Direct and Rebuttal Testimony, 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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**CERTIFICATE OF SERVICE
Docket No. 010740-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Federal Express this 6th day of August, 2001 to the following:

Mary Anne Helton
Staff Counsel
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James Meza III

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: August 6, 2001
_____)	

**MOTION FOR EXTENSION OF TIME TO FILE
DIRECT AND REBUTTAL TESTIMONY**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully requests, pursuant to Rule 28-106.204, Florida Administrative Code, a two week extension of time or until August 27, 2001 to file direct and rebuttal testimony. In support of this Motion, BellSouth states the following:

1. On May 11, 2001, IDS Long Distance, Inc. n/k/a IDS Telecom, L.L.C. ("IDS") filed its Complaint and Request for Emergency Relief ("Complaint"). IDS' Complaint consists of thirty-four (34) pages of factually intensive allegations. In addition, attached as exhibits to IDS' Complaint, are thirteen (13) alleged customer affidavits. Discovery in this proceeding must be completed by September 14, 2001, and the hearing is set for September 21, 2001 and October 1, 2001.

2. On July 23, 2001, IDS filed its direct testimony.¹ Said testimony is voluminous and factually intensive as it purportedly sets forth specific conversations and events, including direct quotes, that IDS personnel had with BellSouth over a two-year period. Importantly, IDS' testimony alleges facts and events that were not included in IDS' Complaint and which BellSouth was

unaware of until it received its direct testimony. Further, BellSouth cannot understand portions of IDS' testimony without further clarification.

3. BellSouth's direct and rebuttal testimony is currently due on August 13, 2001. BellSouth is prohibited from filing surrebuttal testimony.

4. On July 30, 2001, BellSouth served detailed interrogatories and requests for production on IDS to obtain more information and to get a better understanding of the direct testimony IDS filed on July 25, 2001. IDS' response to this discovery is due on August 20, 2001.

5. BellSouth requests a two-week extension of time or until August 27, 2001 to file direct and rebuttal testimony. A two-week extension is necessary to allow BellSouth to review and incorporate in its direct and rebuttal testimony IDS' responses to its discovery.

6. As stated above, said discovery primarily relates to IDS' direct testimony, which alleges facts and events that BellSouth was unaware of until the testimony was filed on July 23, 2001. Further, said discovery also attempts to obtain clarification regarding several portions of IDS' direct testimony. Without the ability to review and incorporate IDS' responses to the discovery in its rebuttal testimony, BellSouth will be severely prejudiced as it will be unable to understand and provide an adequate response to the detailed, additional allegations that IDS presented in its direct testimony. This fact is further

¹ IDS' testimony was originally due on July 11, 2001. IDS received an extension until July 23, 2001 to file direct testimony.

compounded by the fact that, unlike IDS, BellSouth only has "one shot" to file testimony.

7. BellSouth would not object to IDS receiving a corresponding two-week extension of time to file rebuttal testimony.

8. BellSouth understands that IDS objects to the extension of time to file direct and rebuttal testimony.

WHEREFORE, for the foregoing reasons, BellSouth respectfully requests that the Commission, provide BellSouth a two-week extension of time or until August 27, 2001 to file direct and rebuttal testimony.

Respectfully submitted this 6th day of August, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

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c/o Nancy H. Sims

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