

ORIGINAL

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December 20, 2001

Mrs. Blanca S. Bayó  
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Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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Re: Docket No. 990649A-TP (UNE Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Extension of Time to respond to Staff's First Request for Production of Documents (Nos. 1-18) and Staff's First Set of Interrogatories (Nos. 1-67) 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,

*Andrew D. Shore*  
Andrew D. Shore (LRA)

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

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**CERTIFICATE OF SERVICE  
Docket No. 990649A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
FedEx. Mail this 20<sup>th</sup> day of December, 2001 to the following:

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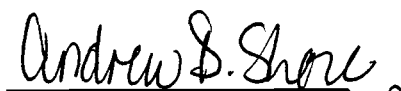
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**(+) Signed Protective Agreement**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network element ) Docket No.: 990649A-TP  
\_\_\_\_\_ ) Filed: December 20, 2001

**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 seven (7) day extension of time or until January 7, 2002, in which to respond to Staff's First Request for Production of Documents (Nos. 1-18) and Staff's First Set of Interrogatories (Nos. 1-67). In support of this motion, BellSouth shows the Commission that:

1. On December 14, 2001, the Florida Public Service Commission Staff (hereinafter "Staff") filed and served its First Request for Production of Documents and First Set of Interrogatories ("discovery requests") on BellSouth via U.S. mail. BellSouth received the discover requests on December 17, 2001.

2. The discovery requests contain 67 interrogatories, not including sub-parts, and 18 requests for production of documents.

3. Pursuant to the expedited discovery deadlines set forth in the Commission's procedural orders in this docket, BellSouth's objections, if any, to Staff's discovery requests are due on December 24, 2001, and its responses to Staff's discovery requests are due on December 31, 2001.

4. Responding to the numerous discovery requests will require a substantial effort by BellSouth such that it would be extremely difficult to fully and completely respond to all of the discovery requests by December 31, even

without the intervening holidays. Moreover, much of the time between the date BellSouth received the discovery requests and the current deadline will accrue during the Christmas holiday, when many of the BellSouth employees needed to provide information necessary to prepare responses to the discovery requests will be on vacation.

5. A 7-day extension of the deadlines for BellSouth to file and serve objections, if any, and responses to the discovery requests will not prejudice the Staff or its counsel in any manner. The hearing in this matter does not begin until January 30, 2002, more than three weeks after the date BellSouth is proposing to file and serve its responses to the discovery requests. Such an extension will, on the other hand, allow BellSouth sufficient time to fully respond to the numerous discovery requests.

6. Counsel for BellSouth has consulted with Staff's counsel regarding this request for an extension of time, and counsel for the Staff indicated that Staff does not object to the Commission granting the requested extension.

**WHEREFORE**, BellSouth respectfully requests that the Commission grant it a seven day extension of time, or until January 7, 2002, to file and serve its responses to Staff's First Request for Production and First Set of Interrogatories, and until December 31, 2001, for BellSouth to file and serve objections, if any, to the discovery requests.

Respectfully submitted this 20<sup>th</sup> day of December, 2001.

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